

Exhibit 6

Kenneth A. Gallo (*pro hac vice*)
Joseph J. Simons (*pro hac vice*)
Craig A. Benson (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
2001 K Street, NW
Washington, DC 20006-1047
Telephone: (202) 223-7300
Facsimile: (202) 223-7420
Email: kgallo@paulweiss.com
Email: jsimons@paulweiss.com
Email: cbenson@paulweiss.com

Stephen E. Taylor (SBN 058452)
Jonathan A. Patchen (SBN 237346)
TAYLOR & COMPANY LAW OFFICES, LLP
One Ferry Building, Suite 355
San Francisco, California 94111
Telephone: (415) 788-8200
Facsimile: (415) 788-8208
Email: staylor@tcolaw.com
Email: jpatchen@tcolaw.com

*Attorneys for Plaintiffs Sharp Electronics Corporation and
Sharp Electronics Manufacturing Company of America, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To:

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,
No. 13-cv-1173;

Electrograph Systems, Inc. et al. v. Technicolor SA,
et al., No. 13-cv-05724;

Siegel v. Technicolor SA, et al., No. 13-cv-05261;

Best Buy Co., Inc., et al. v. Technicolor SA, et al.,
No. 13-cv-05264;

Target Corp. v. Technicolor SA, et al., No. 13-cv-
05686;

Interbond Corporation of America v. Technicolor

Case No. 07-cv-5944 (SC)

MDL No. 1917

**DECLARATION OF CRAIG A.
BENSON IN SUPPORT OF DIRECT
ACTION PLAINTIFFS' LETTER
BRIEF IN OPPOSITION TO
THOMSON'S MOTIONS TO
COMPEL DATED 9/12/2014 AND
9/19/2014**

1 *SA, et al.*, No. 13-cv-05727;

2 *Office Depot, Inc. v. Technicolor SA, et al.*, No. 13-
cv-05726;

3 *Costco Wholesale Corporation v. Technicolor SA, et*
4 *al.*, No. 13-cv-05723;

5 *P.C. Richard & Son Long Island Corporation, et al.*
v. Technicolor SA, et al., No. 13-cv-05725;

6 *Schultze Agency Services, LLC v. Technicolor SA,*
7 *Ltd., et al.*, No. 13-cv-05668;

8 *Sears, Roebuck and Co. and Kmart Corp. v.*
Technicolor SA, No. 3:13-cv-05262;

9 *Tech Data Corp., et al. v. Hitachi, Ltd., et al.*, No.
10 13-cv-00157;

11
12 I, CRAIG A. BENSON, hereby declare as follows:

13 1. I am a partner with the law firm of Paul, Weiss, Rifkind, Wharton &
14 Garrison LLP, counsel for Plaintiffs Sharp Electronics Corporation (“SEC”) and Sharp
15 Electronics Manufacturing Company of America, Inc. (“SEMA”). I am an active member in
16 good standing of the bars of the State of Maryland, the State of New York, and the District of
17 Columbia, and on March 20, 2013 was granted leave to appear *pro hac vice* in this litigation. I
18 have personal knowledge of the facts stated herein and could competently testify to these facts if
19 called upon to do so. I submit this Declaration in support of Direct Action Plaintiffs’ (“DAPs”)
20 concurrently filed Letter Brief in Opposition to Thomson’s Motions to Compel Dated 9/12/2014
21 and 9/19/2014.

22 2. I have attached as exhibits to this declaration excerpts of discovery
23 responses served by Direct Action Plaintiffs. Upon request, Direct Action Plaintiffs will provide
24 full copies of any attached exhibit.

25 3. Attached as Exhibit A is a true and correct copy of relevant excerpts from
26 Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of
27

1 America, Inc.'s Responses and Objections to Defendants Panasonic Corporation and LG
2 Electronics, Inc.'s First Set of Requests for Production of Documents, dated July 22, 2013.

3 4. Attached as Exhibit B is a true and correct copy of relevant excerpts from
4 Plaintiffs Sears, Roebuck and Co. and Kmart Corporation's Responses and Objections to
5 Defendants Tatung Company of America, Inc. and Samsung Electronics Co., Ltd.'s First Set of
6 Requests for Production of Documents, dated August 17, 2012 as provided to me by counsel for
7 Sears, Roebuck and Co. and Kmart Corporation.

8 5. Attached as Exhibit C is a true and correct copy of relevant excerpts from
9 ABC Appliance, Inc. D/B/A ABC Warehouse's Objections and Responses to Defendants
10 Toshiba America Electronic Components, Inc.'s and Philips Electronics North America
11 Corporation's First Requests for Production of Documents, dated August 17, 2012 as provided to
12 me by counsel for ABC Appliance, Inc.

13 6. Attached as Exhibit D is a true and correct copy of relevant excerpts from
14 Interbond Corporation of America's Objections and Responses to Defendants Samsung SDI Co.,
15 Ltd.'s and Hitachi Asia, Ltd.'s First Requests for Production of Documents, dated August 17,
16 2012 as provided to me by counsel for Interbond Corporation.

17 7. Attached as Exhibit E is a true and correct copy of relevant excerpts from
18 Electrograph Systems, Inc.'s and Electrograph Technologies Corp.'s Objections and Responses
19 to Defendants Hitachi Electronic Devices (USA) Inc.'s and Samsung SDI America, Inc.'s First
20 Requests for Production of Documents, dated August 17, 2012 as provided to me by counsel for
21 Electrograph Systems, Inc. and Electrograph Technologies Corp.

22 8. Attached as Exhibit F is a true and correct copy of relevant excerpts from
23 Marta Cooperative of America, Inc.'s Objections and Responses to Defendants Toshiba America
24 Electronic Components, Inc.'s and Philips Electronics North America Corporation's First
25 Requests for Production of Documents, dated August 17, 2012 as provided to me by counsel for
26 Marta Cooperative of America, Inc.

1 9. Attached as Exhibit G is a true and correct copy of relevant excerpts from
2 P.C. Richard & Son Long Island Corporation's Objections and Responses to Defendants Toshiba
3 America Electronic Components, Inc.'s and Philips Electronics North America Corporation's
4 First Requests for Production of Documents, dated August 17, 2012 as provided to me by
5 counsel for P.C. Richard & Son Long Island Corporation.

6 10. Attached as Exhibit H is a true and correct copy of relevant excerpts from
7 Schultze Agency Services, LLC on behalf of Tweeter Newco, LLC's Objections and Responses
8 to Defendants LG Electronics, Inc.'s and Panasonic Corporation of North America's First
9 Requests for Production of Documents, dated August 17, 2012 as provided to me by counsel for
10 Schultze Agency Services, LLC on behalf of Tweeter Newco, LLC.

11 11. Attached as Exhibit I is a true and correct copy of relevant excerpts from
12 Plaintiff Target Corp.'s Responses and Objections to Defendants Tatung Company of America,
13 Inc. and Samsung Electronics Co., Ltd.'s First Set of Requests for Production of Documents,
14 dated August 17, 2014 as provided to me by counsel for Target Corp.

15 12. Attached as Exhibit J is a true and correct copy of relevant excerpts from
16 Office Depot's Objections and Responses to Defendants Toshiba America Electronic
17 Components, Inc.'s and Philips Electronics North America Corporation's First Requests for
18 Production of Documents, dated August 31, 2012 as provided to me by counsel for Office Depot.

19 13. Attached as Exhibit K is a true and correct copy of relevant excerpts from
20 Plaintiff's Responses to Defendants Panasonic Corporation's and LG Electronics, Inc.'s First Set
21 of Requests for Production of Documents, dated August 17, 2012 as provided to me by counsel
22 for Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy
23 Stores, L.P.; Bestbuy.com, LLC; and Magnolia Hi-Fi, Inc.

24 14. Attached as Exhibit L is a true and correct copy of relevant excerpts from
25 Costco Wholesale Corporation's Responses and Objections to Philips Electronics North America
26 Corporation and Toshiba America Electronic Components, Inc.'s First Set of Requests for
27
28

1 Production, dated August 17, 2012 as provided to me by counsel for Costco Wholesale
2 Corporation.

3 15. Attached as Exhibit M is a true and correct copy of relevant excerpts from
4 Tech Data Corporation and Tech Data Product Management, Inc.'s Responses and Objections to
5 Panasonic Corporation and Hitachi Electronic Devices (USA), Inc.'s First Set of Requests for
6 Production of Documents, dated August 5, 2013 as provided to me by counsel for Tech Data
7 Corporation and Tech Data Product Management, Inc.

8 16. Attached as Exhibit N is a true and correct copy of relevant excerpts from
9 Responses and Objections of Alfred H. Siegel, as Trustee of The Circuit City Stores, Inc.
10 Liquidating Trust, to First Request for Production of Documents from Thomson SA and
11 Thomson Consumer Electronics, Inc., dated July 10, 2014 as provided to me by counsel for
12 Alfred H. Siegel, as Trustee of The Circuit City Stores, Inc.

13 I declare under penalty of perjury, that the foregoing is true and correct. Executed
14 this 3rd day of October, 2014, at Washington, DC.

15 /s/ Craig A. Benson

16 Craig A. Benson
17
18
19
20
21
22
23
24
25
26
27
28

1 Jason C. Murray (CA Bar No. 169806)
2 Robert B. McNary (CA Bar No. 253745)
3 CROWELL & MORING LLP
4 515 South Flower St., 40th Floor
5 Los Angeles, CA 90071
6 Telephone: 213-443-5582
7 Facsimile: 213-622-2690
8 Email: jmurray@crowell.com
9 rmcnary@crowell.com

6 Jerome A. Murphy (*pro hac vice*)
7 Astor H.L. Heaven (*pro hac vice*)
8 CROWELL & MORING LLP
9 1001 Pennsylvania Avenue, N.W.
10 Washington, D.C. 20004
11 Telephone: 202-624-2500
12 Facsimile: 202-628-5116
13 Email: jmurphy@crowell.com
14 aheaven@crowell.com

11 *Counsel For Target Corporation*

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

17 IN RE: CATHODE RAY TUBE (CRT)
18 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC
MDL No. 1917

The Honorable Samuel Conti

19 This Document Relates to:

Individual Case Nos. 3:11-cv-05514
3:13-cv-05686

21 *Target Corporation v. Chunghwa Picture*
22 *Tubes, Ltd. et al.*, No. 11-cv-05514

23 *Target Corporation v. Technicolor SA, et*
24 *al.*, No. 13-cv-05686

**DECLARATION OF ASTOR H. L.
HEAVEN IN SUPPORT OF DIRECT
ACTION PLAINTIFFS' LETTER BRIEF
IN OPPOSITION TO THOMSON'S
MOTIONS TO COMPEL DATED
SEPTEMBER 12, 2014 AND SEPTEMBER
19, 2014**

1 I, Astor H.L. Heaven, hereby declare as follows:

2 1. I am an attorney with the law firm of Crowell & Moring LLP, which represents Target
3 Corporation (“Target”) in the above-captioned actions currently pending in the United States
4 District Court for the Northern District of California. I am a member in good standing of the
5 District of Columbia and Maryland bars, and am admitted to appear in this Court *pro hac vice* in
6 *In re Cathode Ray Tube (CRT) Antitrust Litigation*, Case No. 07-5944-SC, MDL No. 1917
7 (“MDL 1917”). The matters stated herein are true to my own personal knowledge, and, if called
8 as a witness, I could and would competently testify thereto.

9 2. I submit this declaration in support of the Direct Action Plaintiffs’ letter brief in
10 opposition to Thomson’s Motions to Compel dated September 12, 2014 and September 19, 2014.
11 I have personal knowledge of the facts stated herein and, if called as a witness, I could and would
12 competently testify thereto.

13 3. Target has produced, to the extent any such documents exist, all documents in its custody
14 and control relating to its fraudulent concealment allegations, including documents concerning (i)
15 whether Target had a suspicion or belief that any defendant was engaged in anticompetitive
16 conduct before November 26, 2007; (ii) fraudulent concealment by the Thomson Defendants; and
17 (iii) steps or actions taken by Target to discover the facts alleged in its complaint prior to
18 November 26, 2007.

19 I declare under penalty of perjury of the laws of the United States that the foregoing is true
20 and correct.

21
22 Executed this 3rd day of October, 2014, in Washington, District of Columbia.

23
24 /s/ Astor H.L. Heaven
25 Astor H.L. Heaven
26
27
28

Richard Alan Arnold, Esquire
William J. Blechman, Esquire
Kevin J. Murray, Esquire
Samuel J. Randall, Esquire
KENNY NACHWALTER, P.A.
201 S. Biscayne Boulevard, Suite 1100
Miami, Florida 33131
Tel: (305) 373-1000
Fax: (305) 372-1861
E-mail: rarnold@knpa.com
wblechman@knpa.com
kmurray@knpa.com
srandall@knpa.com

Counsel for Plaintiffs Sears, Roebuck and Co. and Kmart Corporation

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to: Individual Case No.
& 13-cv-05262

SEARS, ROEBUCK AND CO. & KMART
CORPORATION

v.

TECHNICOLOR SA, ET AL., *et al.*,

Defendants.

Master Case No. 3:07-cv-05944-SC
Individual Case No. 3:13-cv-05262

MDL No. 1917

**DECLARATION OF SAMUEL J.
RANDALL IN SUPPORT OF DIRECT
ACTION PLAINTIFFS' LETTER BRIEF
IN OPPOSITION TO THOMSON'S
MOTIONS TO COMPEL DATED
SEPTEMBER 12, 2014 AND SEPTEMBER
19, 2014**

1 I, Samuel J. Randall, declare as follows:

2 1. I am an attorney with Kenny Nachwalter P.A., counsel for Plaintiffs Sears, Roebuck and
3 Co. ("Sears") and Kmart Corporation ("Kmart") in these actions. I am a member in good standing
4 of the bars of the states of Florida and the Commonwealth of Massachusetts and I am admitted to
5 practice before this Court *pro hac vice*;

6
7 2. I submit this declaration in support of the Direct Action Plaintiffs' letter brief in
8 opposition to Thomson's Motions to Compel dated September 12, 2014 and September 19, 2014. I
9 have personal knowledge of the facts stated herein and, if called as a witness, I could and would
10 competently testify thereto; and

11
12 3. Sears and Kmart have produced, to the extent any such documents exist, all documents in
13 their custody and control relating to their fraudulent concealment allegations, including documents
14 concerning (i) whether Sears and Kmart had a suspicion or belief that any defendant was engaged in
15 anticompetitive conduct before November 26, 2007; (ii) fraudulent concealment by the Thomson
16 Defendants; and (iii) steps or actions taken by Sears and Kmart to discover the facts alleged in their
17 complaint prior to November 26, 2007.

18
19 I declare under penalty of perjury under that the foregoing is true and correct. Executed on:

20
21 October 3, 2014, in Miami, Florida

By: /s/Samuel J. Randall

Samuel J. Randall, Esq.

22
23 **CERTIFICATE OF SERVICE**

24 **I HEREBY CERTIFY** that on October 3, 2014, I served by electronic mail a true and
25 correct copy of this Declaration on counsel for Thomson.

26
27 /s/Samuel J. Randall

EXHIBIT A

Stephen E. Taylor (SBN 058452)
Jonathan A. Patchen (SBN 237346)
TAYLOR & COMPANY LAW OFFICES, LLP
One Ferry Building, Suite 355
San Francisco, California 94111
Telephone: (415) 788-8200
Facsimile: (415) 788-8208
Email: staylor@tcolaw.com
Email: jpatchen@tcolaw.com

Kenneth A. Gallo (*pro hac vice*)
Joseph J. Simons (*pro hac vice*)
Craig A. Benson (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
2001 K Street, NW
Washington, DC 20006-1047
Telephone: (202) 223-7300
Facsimile: (202) 223-7420
Email: kgallo@paulweiss.com
Email: jsimons@paulweiss.com
Email: cbenson@paulweiss.com

*Attorneys for Sharp Electronics Corporation and
Sharp Electronics Manufacturing Company of America, Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**In Re CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Case No. 07-cv-5944-SC
MDL NO. 1917

This Document Relates to:

*Sharp Electronics Corporation, Sharp Electronics
Manufacturing Company of America, Inc. v. Hitachi,
Ltd. et al., Case No. 13-cv-1173 SC.*

**PLAINTIFFS SHARP
ELECTRONICS CORPORATION
AND SHARP ELECTRONICS
MANUFACTURING COMPANY OF
AMERICA, INC.'S RESPONSES
AND OBJECTIONS TO
DEFENDANTS PANASONIC
CORPORATION AND LG
ELECTRONICS, INC.'S FIRST SET
OF REQUESTS FOR PRODUCTION
OF DOCUMENTS**

PROPOUNDING PARTIES:

Defendants Panasonic Corporation and LG
Electronics, Inc.

RESPONDING PARTIES:

Sharp Electronics Corporation and Sharp
Electronics Manufacturing Company of America,
Inc.

SET NO.:

ONE

1 Products sold by Sharp in the United States during the period of March 1, 1995 to December
 2 2007, located following a reasonable search.

3 **Request No. 25:**

4 All Documents relating to your suspicion or belief that any Defendant was engaged in
 5 any anticompetitive conduct relating to CRTs or CRT Products, including the date You first
 6 suspected such conduct and the circumstances surrounding, and reasons for, such suspicions or
 7 beliefs.

8 **Response to Request No. 25**

9 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
 10 also objects to this Request, including the time frame for the Request, on the grounds that it is
 11 overly broad, unduly burdensome and oppressive, and is not calculated to lead to the discovery
 12 of admissible evidence. Sharp further objects to this Request on the grounds that it seeks
 13 information that is protected by the attorney-client privilege, the work product doctrine, and/or
 14 any other protection or privilege.

15 Subject to and without waiving the foregoing objections, Sharp will produce non-
 16 privileged documents, if any, created before November 26, 2007, relating to a suspicion or belief
 17 by Sharp that any Defendant was engaged in any anticompetitive conduct relating to CRTs in the
 18 United States during the Relevant Period, located following a reasonable search.

19 **Request No. 26:**

20 Without limitation as to time, all Documents relating to any statement or action by any
 21 Defendant, or any other Person or entity that You contend had the effect of concealing any of
 22 Your claims.

23 **Response to Request No. 26**

24 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
 25 also objects to this Request, including the time frame for the Request, on the grounds that it is
 26 overly broad, unduly burdensome and oppressive, and seeks documents in the possession of the
 27 Defendants.

1 Subject to and without waiving the foregoing objections, Sharp will produce non-
 2 privileged documents, if any, relating to any statement or action by any Defendant, or any other
 3 Person or entity, that had the effect of concealing any of Sharp's claims, located following a
 4 reasonable search.

5 **Request No. 27:**

6 Without limitation as to time, all Documents concerning any steps or actions taken by
 7 You to discover the facts alleged in the Complaint that You contend support Your claims.

8 **Response to Request No. 27**

9 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
 10 also objects to this Request, including the time frame for the Request, on the grounds that it is
 11 overly broad, unduly burdensome and oppressive, and/or is duplicative of other requests
 12 including at least Request No. 25. Sharp further objects to this Request on the grounds that it
 13 seeks information that is protected by the attorney-client privilege, the work product doctrine,
 14 and/or any other protection or privilege.

15 Subject to and without waiving the foregoing objections, Sharp will produce non-
 16 privileged documents, if any, created prior to November 26, 2007, concerning any steps or
 17 actions taken by Sharp to discover the facts alleged in the Complaint that support Sharp's claims,
 18 located following a reasonable search.

19 **Request No. 28:**

20 All Documents relating to the sharing of information between manufacturers of CRTs.

21 **Response to Request No. 28**

22 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
 23 also objects to this Request, including the time frame for the Request, on the grounds that it is
 24 overly broad, unduly burdensome and oppressive, is duplicative of other requests including at
 25 least Request No. 25, seeks documents in the possession of or equally available to the
 26 Defendants, and is not calculated to lead to the discovery of admissible evidence.

1 DATED: July 22, 2013

By: /s/ Craig A. Benson

2 Stephen E. Taylor (SBN 058452)
3 Jonathan A. Patchen (SBN 237346)
4 TAYLOR & COMPANY LAW OFFICES, LLP
5 One Ferry Building, Suite 355
6 San Francisco, California 94111
7 Telephone: (415) 788-8200
8 Facsimile: (415) 788-8208
9 Email: staylor@tcolaw.com
10 Email: jpatchen@tcolaw.com

11 Kenneth A. Gallo (*pro hac vice*)
12 Joseph J. Simons (*pro hac vice*)
13 Craig A. Benson (*pro hac vice*)
14 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
15 2001 K Street, NW
16 Washington, DC 20006
17 Telephone: (202) 223-7300
18 Facsimile: (202) 223-7420
19 kgallo@paulweiss.com
20 jsimons@paulweiss.com
21 cbenson@paulweiss.com

22 *Attorneys for Plaintiffs*

EXHIBIT B

1 Jason C. Murray (CA Bar No. 169806)
2 CROWELL & MORING LLP
3 515 South Flower St., 40th Floor
4 Los Angeles, CA 90071
5 Telephone: 213-622-4750
6 Facsimile: 213-622-2690
7 Email: jmurray@crowell.com

8 Counsel for Plaintiffs
9 *Target Corp.; Sears, Roebuck and Co.;*
10 *Kmart Corp.; Old Comp Inc.; Good*
11 *Guys, Inc.; RadioShack Corp.*
12

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16

17 IN RE CATHODE RAY TUBE (CRT)
18 ANTITRUST LITIGATION

19 This Document Relates To:

20 *Target Corp., et al. v. Chunghwa*
21 *Picture Tubes, Ltd., et al., Case No.*
22 *3:11-CV-05514-SC*

CASE NO. 3:11-CV 11-05514-SC

MASTER FILE NO. CV 07-5944-SC

MDL NO. 1917

**PLAINTIFFS SEARS, ROEBUCK AND CO.
AND KMART CORPORATION'S
RESPONSES AND OBJECTIONS TO
DEFENDANTS TATUNG COMPANY OF
AMERICA, INC. AND SAMSUNG
ELECTRONICS CO., LTD.'S FIRST SET
OF REQUESTS FOR PRODUCTION OF
DOCUMENTS**

23 PROPOUNDING PARTY: Defendants Tatung Company of America, Inc. and Samsung
24 Electronics Co., LTD

25 RESPONDING PARTY: Plaintiffs Sears Roebuck and Co. and Kmart Corporation

26 SET NO.: ONE
27
28

Pursuant to Rule 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs Sears, Roebuck and Co. and Kmart Corporation (together, “Sears”) hereby object to the First Set of Requests for Production of Documents to Sears (“Requests”) served by counsel for Tatung Company of America, Inc. and Samsung Electronics Co., Ltd. (collectively, “Defendants”) in the above-captioned matter. For the reasons specified below, Sears objects generally and specifically to all specifications in the Requests. Sears reserves the right to supplement the objections and responses set forth below.

GENERAL OBJECTIONS

Sears asserts the following General Objections to the Requests, which are incorporated by reference in each specific response as though set forth fully therein:

1. Sears objects to the Requests, including the instructions and definitions, to the extent they are overbroad, burdensome, and seek information that is outside the scope of any allowable discovery by the court.

2. Sears objects to the Requests to the extent they call for documents not in the possession, custody, or control of Sears. Sears does not have possession, custody, or control documents possessed by individuals that are former employees, former agents, subcontractors, independent contractors, third parties, the media, or other persons and entities whose documents are not accessible to Sears. Sears further objects to the Requests to the extent they are duplicative of documents and information that are equally or more readily available to Defendants through public sources, or are already in Defendants’ possession, custody, or control.

3. Sears objects to the Requests to the extent they seek information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

4. Sears objects to the Requests to the extent they seek documents that contain trade secrets or otherwise contain confidential, proprietary, or competitively sensitive information, the disclosure of which could cause serious injury to Sears.

5. Sears objects to the Requests to the extent they seek documents and information protected from disclosure by the attorney-client privilege, the work-product doctrine, and/or any

1 other applicable privilege, immunity, or protective doctrine. Such information will not be
2 produced; any production thereof is inadvertent and not a waiver of any applicable protection
3 against disclosure.

4 6. Sears objects to the Requests to the extent they would require Sears to disclose
5 information that would cause Sears to violate its existing contractual obligations to other parties
6 to maintain the confidentiality of such information.

7 7. Sears objects to the Requests to the extent that the specifications are vague and
8 ambiguous. Sears also objects to Defendants' definitions of words to the extent they are
9 inconsistent with the plain meaning of those words or impose an expanded definition of the words
10 or phrases. By responding to a request containing such a definition, Sears does not adopt
11 definitions of terms propounded by Defendants. Instead, Sears expressly reserves its right to
12 narrow the scope of the purported definition.

13 8. Sears objects to the Requests to the extent they impose obligations that exceed
14 those imposed by applicable law, including the Federal Rules of Civil Procedure. By providing
15 these objections Sears does not in any way waive, or intend to waive, but rather intends to
16 preserve and is preserving all objections on any ground to the use of any documents produced by
17 Sears in any subsequent proceedings, including any other lawsuits or proceedings.

18 9. Sears objects to the time period specified in the Requests for production of
19 documents as unduly burdensome and oppressive. Sears will produce documents at a mutually-
20 convenient time agreed to by Sears and Defendants.

21 10. Sears objects to the Requests to the extent that they prematurely call for expert
22 testimony and state that Sears will provide expert disclosures as provided by the Federal Rule of
23 Civil Procedure or order of the court.

24 11. Sears objects to the Requests, including the instructions and definitions, on the
25 grounds that Sears will incur substantial expense complying with the inspection and copying
26 command.

27
28

12. Sears objects to the Requests to the extent Defendants are drawing a distinction between CRTs and CRT Products. In responding to these Requests, Sears is interpreting all Requests related to CRTs to include its purchases of CRT Products, which contain CRTs.

13. Sears has not completed its discovery and preparation in this matter, and Sears' investigation of this case is ongoing. Sears' responses are being made after reasonable inquiry into the relevant facts, and the responses are based only upon the information and documentation that is presently available to and known to Sears. Further investigation and discovery may result in the identification of additional information or contentions, and Sears reserves the right to modify its responses. Sears' responses should not be construed to prejudice Sears' right to conduct further investigation in this case, or to limit Sears' use of any additional evidence that may be developed.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All Documents You Identified or were requested to Identify in response to the Interrogatories served herewith.

RESPONSE TO REQUEST NO. 1:

Sears refers to and incorporates its General Objections as though set forth fully herein. Sears also refers to and incorporates its objections and responses to Defendants' Interrogatories. Sears further objects to this Request on the grounds that it seeks documents that are irrelevant to the claims or defenses of any party, and is not reasonably calculated to lead to the discovery of admissible evidence. Sears further objects to this Request on the grounds and to the extent it seeks information protected by the attorney client privilege, the attorney work-product doctrine, or any other available privilege or protection.

REQUEST NO. 2:

All Documents concerning any CRTs or CRT Products purchased by You or on Your behalf from Defendants during the Relevant Period, including Documents evidencing for each CRT or CRT Product:

1 Relevant Period and is not reasonably calculated to lead to the discovery of admissible evidence.
2 Sears further objects to this Request on the grounds that it is overly broad, unduly burdensome
3 and oppressive. Sears further objects that this Request seeks documents that are equally available
4 to Defendants, or can be obtained from another source that is more convenient, less burdensome, or
5 less expensive. Sears further objects to this Request as vague and ambiguous; specifically, the
6 references to “revenue, costs, profitability and margins” are vague and ambiguous.

7 Subject to and without waiving any of the foregoing objections, Sears offers to meet and
8 confer with Defendants regarding the scope of this Request.

9 **REQUEST NO. 24:**

10 All Documents relating to your suspicion or belief that any Defendant was engaged in any
11 anticompetitive conduct relating to CRTs or CRT Products, including the date You first suspected
12 such conduct and the circumstances surrounding, and reasons for, such suspicions or beliefs.

13 **RESPONSE TO REQUEST NO. 24:**

14 Sears refers to and incorporates its General Objections as though set forth fully herein.
15 Sears further objects to this Request on the grounds that it is overly broad, unduly burdensome
16 and oppressive. Sears further objects that this Request seeks documents that are equally available
17 to Defendants, or can be obtained from another source that is more convenient, less burdensome, or
18 less expensive. Sears further objects to this Request on the grounds and to the extent that the
19 Request seeks information protected by the attorney client privilege, the attorney work-product
20 doctrine, or any other available privilege or protection. Sears further objects to this Request as
21 vague and ambiguous; specifically, the reference to “suspicion,” “belief,” and “anticompetitive
22 conduct,” are vague and ambiguous.

23 Subject to and without waiving any of the foregoing objections, Sears offers to meet and
24 confer with Defendants regarding the scope of this Request.

25 **REQUEST NO. 25:**

26 Without limitation as to time, all Documents relating to any statement or action by any
27 Defendant, or any other Person or entity that You contend had the effect of concealing any of
28 Your claims.

RESPONSE TO REQUEST NO. 25:

Sears refers to and incorporates its General Objections as though set forth fully herein.

Sears further objects to this Request on the grounds that it is overly broad, unduly burdensome and oppressive. Sears further objects that this Request calls for premature contention discovery.

Sears further objects that this Request seeks documents that are equally available to Defendants, particularly to the extent it seeks documents that are either publicly available or are in the possession of Defendants and their co-conspirators. Sears further objects to this Request on the grounds that it calls for a legal conclusion. Sears further objects to this Request on the grounds and to the extent that the Request seeks information protected by the attorney client privilege, the attorney work-product doctrine, or any other available privilege or protection. Sears further objects to this Request as vague and ambiguous; specifically, the reference to “concealing” is vague and ambiguous.

Subject to and without waiving any of the foregoing objections, Sears offers to meet and confer with Defendants regarding the scope of this Request.

REQUEST NO. 26:

Without limitation as to time, all Documents concerning any steps or actions taken by YOU to discover the facts alleged in the Complaint that You contend support Your claims.

RESPONSE TO REQUEST NO. 26:

Sears refers to and incorporates its General Objections as though set forth fully herein.

Sears further objects to this Request on the grounds that it is overly broad, unduly burdensome and oppressive. Sears further objects that this Request calls for premature contention discovery.

Sears further objects to this Request on the grounds and to the extent that the Request seeks information protected by the attorney client privilege, the attorney work-product doctrine, or any other available privilege or protection.

Subject to and without waiving any of the foregoing objections, Sears offers to meet and confer with Defendants regarding the scope of this Request.

REQUEST NO. 27:

All Documents relating to the sharing of information between manufacturers of CRTs.

1 Defendants.

2 Subject to and without waiving any of the foregoing objections, Sears offers to meet and
3 confer with Defendants regarding the scope of this Request.

4 **REQUEST NO. 33:**

5 Documents sufficient to Identify all purposes for which You purchased or used CRTs and
6 CRT Products.

7 **RESPONSE TO REQUEST NO. 33:**

8 Sears refers to and incorporates its General Objections as though set forth fully herein.
9 Sears further objects to this Request on the grounds that it is overly broad and seeks documents
10 that are irrelevant to the claims or defenses of any party and is not reasonably calculated to lead to
11 the discovery of admissible evidence. Sears further objects to this Request on the grounds that it
12 is unduly burdensome and oppressive.

13 **REQUEST NO. 34:**

14 All Documents relating to the allegations contained in paragraph 173 of the Complaint.

15 **RESPONSE TO REQUEST NO. 34:**

16 Sears refers to and incorporates its General Objections as though set forth fully herein.
17 Sears further objects to this Request on the grounds that it is overly broad, unduly burdensome,
18 and oppressive. Sears further objects that this Request seeks documents that are equally available
19 to Defendants, or can be obtained from another source that is more convenient, less burdensome, or
20 less expensive. Sears further objects to this Request on the grounds and to the extent that the
21 Request seeks information protected by the attorney client privilege, the attorney work-product
22 doctrine, or any other available privilege or protection.

23 DATED: August 17, 2012

24
25 /s/ Jason C. Murray
26 Jason C. Murray
27 CROWELL & MORING LLP

28 *Counsel for Plaintiffs Target Corp.;
Sears, Roebuck and Co.; Kmart Corp.;
Old Comp Inc.; Good Guys, Inc.; and
RadioShack Corp.*

EXHIBIT C

William A. Isaacson (admitted *pro hac vice*)
 Melissa Felder (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, D.C. 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 Email: wisaacson@bsfllp.com
 mfelder@bsfllp.com

Philip J. Iovieno (admitted *pro hac vice*)
 Anne M. Nardacci (admitted *pro hac vice*)
 Luke Nikas (admitted *pro hac vice*)
 Christopher V. Fenlon (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 10 North Pearl Street, 4th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665
 Email: piovieno@bsfllp.com
 anardacci@bsfllp.com
 lnikas@bsfllp.com
 cfenlon@bsfllp.com

Counsel for Plaintiff ABC Appliance, Inc.
 d/b/a ABC Warehouse

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

This Document Relates To Individual Case No.
 3:11-cv-05530-SC (N.D. Cal.)

ABC APPLIANCE, INC. D/B/A
 ABC WAREHOUSE,

Plaintiff,

vs.

HITACHI LTD., et al.,

Defendants.

Case No. 3:11-cv-05530-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

**ABC APPLIANCE, INC. D/B/A ABC
 WAREHOUSE'S OBJECTIONS AND
 RESPONSES TO DEFENDANTS
 TOSHIBA AMERICA ELECTRONIC
 COMPONENTS, INC.'S AND PHILIPS
 ELECTRONICS NORTH AMERICA
 CORPORATION'S FIRST REQUESTS
 FOR PRODUCTION OF DOCUMENTS**

PROPOUNDING PARTIES:

Toshiba America Electronic Components, Inc.
and Philips Electronics North America
Corporation

RESPONDING PARTY:

ABC Appliance, Inc. d/b/a ABC Warehouse

SET:

One

1 ABC Warehouse refers to and incorporates its General Objections as if set forth fully
2 herein. ABC Warehouse also objects to this Request on the grounds that it is overly broad, unduly
3 burdensome and oppressive, seeks or calls for the production of documents that are equally
4 available to Defendants or are irrelevant to the claims or defenses of any party, and is not
5 calculated to lead to the discovery of admissible evidence. ABC Warehouse also objects to the
6 terms “revenue”, “costs”, “profitability”, and “margins” as being vague and ambiguous.

7 Subject to and notwithstanding the foregoing objections, ABC Warehouse will produce
8 responsive, non-privileged audited financial statements created during the period of March 1, 1995
9 through November 25, 2007 to the extent that such documents exist and are kept in the ordinary
10 course of business.

11 **REQUEST NO. 23:**

12 All Documents relating to your suspicion or belief that any Defendant was engaged in
13 any anticompetitive conduct relating to CRTs or CRT Products, including the date You first
14 suspected such conduct and the circumstances surrounding, and reasons for, such suspicions
15 or beliefs.

16 **RESPONSE TO REQUEST NO. 23:**

17 ABC Warehouse refers to and incorporates its General Objections as if set forth fully
18 herein. ABC Warehouse further objects to this Request on the grounds that it seeks information
19 that is protected by the attorney-client privilege, the work product doctrine, and/or any other
20 protection or privilege. ABC Warehouse also objects to this Request on the ground that it is overly
21 broad, unduly burdensome, vague, and ambiguous.

22 Subject to and notwithstanding the foregoing objections, ABC Warehouse will produce
23 responsive, non-privileged documents created during the period of March 1, 1995 through
24 November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of
25 business, based on a search of the files of an agreed upon list of custodians and search terms to be
26 negotiated by the parties.

27 **REQUEST NO. 24:**

28 Without limitation as to time, all Documents relating to any statement or action by any

1 Defendant, or any other Person or entity that You contend had the effect of concealing any of
2 Your claims.

3 **RESPONSE TO REQUEST NO. 24:**

4 ABC Warehouse refers to and incorporates its General Objections as if set forth fully
5 herein. ABC Warehouse further objects to this Request on the grounds that it seeks information
6 that is protected by the attorney-client privilege, the work product doctrine, and/or any other
7 protection or privilege. ABC Warehouse also objects to this Request on the ground that it is overly
8 broad, unduly burdensome, vague, and ambiguous.

9 Subject to and notwithstanding the foregoing objections, ABC Warehouse will produce
10 responsive, non-privileged documents created during the period of March 1, 1995 through
11 November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of
12 business, based on a search of the files of an agreed upon list of custodians and search terms to be
13 negotiated by the parties.

14 **REQUEST NO. 25:**

15 Without limitation as to time, all Documents concerning any steps or actions taken by
16 You to discover the facts alleged in the Complaint that You contend support Your claims.

17 **RESPONSE TO REQUEST NO. 25:**

18 ABC Warehouse refers to and incorporates its General Objections as if set forth fully
19 herein. ABC Warehouse further objects to this Request on the grounds that it seeks information
20 that is protected by the attorney-client privilege, the work product doctrine, and/or any other
21 protection or privilege. ABC Warehouse also objects to this Request on the ground that it is overly
22 broad, unduly burdensome, vague, and ambiguous.

23 Subject to and notwithstanding the foregoing objections, ABC Warehouse will produce
24 responsive, non-privileged documents created during the period of March 1, 1995 through
25 November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of
26 business, based on a search of the files of an agreed upon list of custodians and search terms to be
27 negotiated by the parties.

28 **REQUEST NO. 26:**

1 available to Defendants or are irrelevant to the claims or defenses of any party, and is not
 2 calculated to lead to the discovery of admissible evidence.

3 **REQUEST NO. 33:**

4 All Documents relating to the allegations contained in paragraph 156-157 of the
 5 Complaint.

6 **RESPONSE TO REQUEST NO. 33:**

7 ABC Warehouse refers to and incorporates its General Objections as if set forth fully herein.
 8 ABC Warehouse further objects to this Request on the grounds that it is overly broad, unduly
 9 burdensome and oppressive, and seeks or calls for the production of documents that are either publicly
 10 available, available as part of the U.S. Department of Justice investigation, or were already produced in
 11 this litigation. Such documents are either already in Defendants' possession, or can be obtained from
 12 another source that is more convenient, less burdensome, or less expensive.

13 DATED: August 17, 2012

/s/ Philip J. Iovieno

14 William A. Isaacson (admitted *pro hac vice*)
 15 Melissa Felder (admitted *pro hac vice*)
 16 BOIES, SCHILLER & FLEXNER LLP
 17 5301 Wisconsin Ave. NW, Suite 800
 18 Washington, D.C. 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 Email: wisaacson@bsflp.com
 mfelder@bsflp.com

19 Philip J. Iovieno (admitted *pro hac vice*)
 20 Anne M. Nardacci (admitted *pro hac vice*)
 21 Luke M. Nikas (admitted *pro hac vice*)
 22 Christopher V. Fenlon (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 10 North Pearl Street, 4th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665
 Email: piovieno@bsflp.com
 anardacci@bsflp.com
 lnikas@bsflp.com
 cfenlon@bsflp.com

26 *Counsel for Plaintiff*
 27 *ABC Appliance, Inc. d/b/a ABC Warehouse*

EXHIBIT D

William A. Isaacson (admitted *pro hac vice*)
Melissa Felder (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsfllp.com
mfelder@bsfllp.com

Philip J. Iovieno (admitted *pro hac vice*)
Anne M. Nardacci (admitted *pro hac vice*)
Luke Nikas (admitted *pro hac vice*)
Christopher V. Fenlon (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
10 North Pearl Street, 4th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsfllp.com
anardacci@bsfllp.com
lnikas@bsfllp.com
cfenlon@bsfllp.com

Counsel for Plaintiff
Interbond Corporation of America

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To Individual Case No.
3:11-cv-06275-SC (N.D. Cal.)

INTERBOND CORPORATION OF
AMERICA,

Plaintiff,

vs.

HITACHI LTD., et al.,

Defendants.

Case No. 3:11-cv-06275-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

**INTERBOND CORPORATION OF
AMERICA'S OBJECTIONS AND
RESPONSES TO DEFENDANTS
SAMSUNG SDI CO., LTD.'S AND
HITACHI ASIA, LTD.'S FIRST
REQUESTS FOR PRODUCTION OF
DOCUMENTS**

PROPOUNDING PARTIES:

Samsung SDI Co., Ltd. and Hitachi Asia, Ltd.

RESPONDING PARTY:

Interbond Corporation of America

SET:

One

1 the discovery of admissible evidence. BrandsMart also objects to the terms “revenue”, “costs”,
2 “profitability”, and “margins” as being vague and ambiguous.

3 Subject to and notwithstanding the foregoing objections, BrandsMart will produce
4 responsive, non-privileged audited financial statements created during the period of March 1, 1995
5 through November 25, 2007 to the extent that such documents exist and are kept in the ordinary
6 course of business.

7 **REQUEST NO. 23:**

8 All DOCUMENTS relating to your suspicion or belief that any DEFENDANT was
9 engaged in any anticompetitive conduct relating to CRTs or CRT PRODUCTS, including the date
10 YOU first suspected such conduct and the circumstances surrounding, and reasons for, such
11 suspicions or beliefs.

12 **RESPONSE TO REQUEST NO. 23:**

13 BrandsMart refers to and incorporates its General Objections as if set forth fully herein.
14 BrandsMart further objects to this Request on the grounds that it seeks information that is
15 protected by the attorney-client privilege, the work product doctrine, and/or any other protection or
16 privilege. BrandsMart also objects to this Request on the ground that it is overly broad, unduly
17 burdensome, vague, and ambiguous.

18 Subject to and notwithstanding the foregoing objections, BrandsMart will produce
19 responsive, non-privileged documents created during the period of March 1, 1995 through
20 November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of
21 business, based on a search of the files of an agreed upon list of custodians and search terms to be
22 negotiated by the parties.

23 **REQUEST NO. 24:**

24 Without limitation as to time, all DOCUMENTS relating to any statement or action by any
25 DEFENDANT, or any other PERSON or entity that YOU contend had the effect of concealing
26 any of YOUR claims.

27 **RESPONSE TO REQUEST NO. 24:**

BrandsMart refers to and incorporates its General Objections as if set forth fully herein. BrandsMart further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege, the work product doctrine, and/or any other protection or privilege. BrandsMart also objects to this Request on the ground that it is overly broad, unduly burdensome, vague, and ambiguous.

Subject to and notwithstanding the foregoing objections, BrandsMart will produce responsive, non-privileged documents created during the period of March 1, 1995 through November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of business, based on a search of the files of an agreed upon list of custodians and search terms to be negotiated by the parties.

REQUEST NO. 25:

Without limitation as to time, all DOCUMENTS concerning any steps or actions taken by YOU to discover the facts alleged in the COMPLAINT that YOU contend support YOUR claims.

RESPONSE TO REQUEST NO. 25:

BrandsMart refers to and incorporates its General Objections as if set forth fully herein. BrandsMart further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege, the work product doctrine, and/or any other protection or privilege. BrandsMart also objects to this Request on the ground that it is overly broad, unduly burdensome, vague, and ambiguous.

Subject to and notwithstanding the foregoing objections, BrandsMart will produce responsive, non-privileged documents created during the period of March 1, 1995 through November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of business, based on a search of the files of an agreed upon list of custodians and search terms to be negotiated by the parties.

REQUEST NO. 26:

All DOCUMENTS relating to the sharing of information between manufacturers of CRTs.

RESPONSE TO REQUEST NO. 26:

REQUEST NO. 33:

All DOCUMENTS relating to any decision to purchase CRT PRODUCTS instead of LCD or plasma products, including all documents relating to (a) any LCD or plasma products considered, (b) the price of such items or products, and (c) any factors related to the decision not to purchase the LCD or plasma product.

RESPONSE TO REQUEST NO. 33:

BrandsMart refers to and incorporates its General Objections as if set forth fully herein. BrandsMart also objects to this Request on the grounds that it is overly broad, unduly burdensome and oppressive, seeks or calls for the production of documents that are equally available to Defendants or are irrelevant to the claims or defenses of any party, and is not calculated to lead to the discovery of admissible evidence.

DATED: August 17, 2012

/s/ Philip J. Iovieno

William A. Isaacson (admitted *pro hac vice*)
 Melissa Felder (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, D.C. 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 Email: wisaacson@bsflp.com
 mfelder@bsflp.com

Philip J. Iovieno (admitted *pro hac vice*)
 Anne M. Nardacci (admitted *pro hac vice*)
 Luke M. Nikas (admitted *pro hac vice*)
 Christopher V. Fenlon (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 10 North Pearl Street, 4th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665
 Email: piovieno@bsflp.com
 anardacci@bsflp.com
 lnikas@bsflp.com
 cfenlon@bsflp.com

Counsel for Plaintiff
Interbond Corporation of America

EXHIBIT E

William A. Isaacson (admitted *pro hac vice*)
 Melissa Felder (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, D.C. 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 Email: wisaacson@bsfllp.com
 mfelder@bsfllp.com

Philip J. Iovieno (admitted *pro hac vice*)
 Anne M. Nardacci (admitted *pro hac vice*)
 Luke Nikas (admitted *pro hac vice*)
 Christopher V. Fenlon (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 10 North Pearl Street, 4th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665
 Email: piovieno@bsfllp.com
 anardacci@bsfllp.com
 lnikas@bsfllp.com
 cfenlon@bsfllp.com

Counsel for Plaintiffs
 Electrograph Systems, Inc. and
 Electrograph Technologies Corp.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

This Document Relates To Individual Case No.
 3:11-cv-01656-SC (N.D. Cal.)

ELECTROGRAPH SYSTEMS, INC. AND
 ELECTROGRAPH TECHNOLOGIES CORP.,

Plaintiffs,

vs.

HITACHI LTD., et al.,

Defendants.

Case No. 3:11-cv-01656-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

**ELECTROGRAPH SYSTEMS, INC.'S
 AND ELECTROGRAPH
 TECHNOLOGIES CORP.'S
 OBJECTIONS AND RESPONSES TO
 DEFENDANTS HITACHI
 ELECTRONIC DEVICES (USA),
 INC.'S AND SAMSUNG SDI
 AMERICA, INC.'S FIRST REQUESTS
 FOR PRODUCTION OF DOCUMENTS**

PROPOUNDING PARTIES:

Defendants Hitachi Electronic Devices (USA),
Inc. and Samsung SDI America, Inc.

RESPONDING PARTIES:

Electrograph Systems, Inc. and
Electrograph Technologies Corp.

SET:

One

1 All DOCUMENTS relating to your suspicion or belief that any DEFENDANT was
2 engaged in any anticompetitive conduct relating to CRTs or CRT PRODUCTS, including the date
3 YOU first suspected such conduct and the circumstances surrounding, and reasons for, such
4 suspicions or beliefs.

5 **RESPONSE TO REQUEST NO. 24:**

6 Electrograph refers to and incorporates its General Objections as if set forth fully herein.
7 Electrograph further objects to this Request on the grounds that it seeks information that is
8 protected by the attorney-client privilege, the work product doctrine, and/or any other protection or
9 privilege. Electrograph also objects to this Request on the ground that it is overly broad, unduly
10 burdensome, vague, and ambiguous.

11 Subject to and notwithstanding the foregoing objections, Electrograph will produce
12 responsive, non-privileged documents created during the period of March 1, 1995 through
13 November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of
14 business, based on a search of the files of an agreed upon list of custodians and search terms to be
15 negotiated by the parties.

16 **REQUEST NO. 25:**

17 Without limitation as to time, all DOCUMENTS relating to any statement or action by any
18 DEFENDANT, or any other PERSON or entity that YOU contend had the effect of concealing any
19 of YOUR claims.

20 **RESPONSE TO REQUEST NO. 25:**

21 Electrograph refers to and incorporates its General Objections as if set forth fully herein.
22 Electrograph further objects to this Request on the grounds that it seeks information that is
23 protected by the attorney-client privilege, the work product doctrine, and/or any other protection or
24 privilege. Electrograph also objects to this Request on the ground that it is overly broad, unduly
25 burdensome, vague, and ambiguous.

26 Subject to and notwithstanding the foregoing objections, Electrograph will produce
27 responsive, non-privileged documents created during the period of March 1, 1995 through
28 November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of

1 business, based on a search of the files of an agreed upon list of custodians and search terms to be
2 negotiated by the parties.

3 **REQUEST NO. 26:**

4 Without limitation as to time, all DOCUMENTS concerning any steps or actions taken by
5 YOU to discover the facts alleged in the AMENDED COMPLAINT that YOU contend support
6 YOUR claims.

7 **RESPONSE TO REQUEST NO. 26:**

8 Electrograph refers to and incorporates its General Objections as if set forth fully herein.
9 Electrograph further objects to this Request on the grounds that it seeks information that is
10 protected by the attorney-client privilege, the work product doctrine, and/or any other protection or
11 privilege. Electrograph also objects to this Request on the ground that it is overly broad, unduly
12 burdensome, vague, and ambiguous.

13 Subject to and notwithstanding the foregoing objections, Electrograph will produce
14 responsive, non-privileged documents created during the period of March 1, 1995 through
15 November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of
16 business, based on a search of the files of an agreed upon list of custodians and search terms to be
17 negotiated by the parties.

18 **REQUEST NO. 27:**

19 All DOCUMENTS relating to the sharing of information between manufacturers of
20 CRTs.

21 **RESPONSE TO REQUEST NO. 27:**

22 Electrograph refers to and incorporates its General Objections as if set forth fully herein.
23 Electrograph further objects to this Request on the grounds that it is overly broad, unduly
24 burdensome and oppressive, seeks or calls for the production of documents that are equally
25 available to Defendants or are irrelevant to the claims or defenses of any party, and is not
26 calculated to lead to the discovery of admissible evidence.

27 Subject to and notwithstanding the foregoing objections, Electrograph will produce
28 responsive, non-privileged documents created during the period of March 1, 1995 through

1 available as part of the U.S. Department of Justice investigation, or were already produced in this
2 litigation. Such documents are either already in Defendants' possession, or can be obtained from
3 another source that is more convenient, less burdensome, or less expensive.

4
5 DATED: August 17, 2012

/s/ Philip J. Iovieno

William A. Isaacson (admitted *pro hac vice*)
Melissa Felder (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsfllp.com
mfelder@bsfllp.com

Philip J. Iovieno (admitted *pro hac vice*)
Anne M. Nardacci (admitted *pro hac vice*)
Luke M. Nikas (admitted *pro hac vice*)
Christopher V. Fenlon (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
10 North Pearl Street, 4th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsfllp.com
anardacci@bsfllp.com
lnikas@bsfllp.com
cfenlon@bsfllp.com

Counsel for Plaintiffs
Electrograph Systems, Inc. and
Electrograph Technologies Corp.

EXHIBIT F

William A. Isaacson (admitted *pro hac vice*)
 Melissa Felder (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, D.C. 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 Email: wisaacson@bsflp.com
 mfelder@bsflp.com

Philip J. Iovieno (admitted *pro hac vice*)
 Anne M. Nardacci (admitted *pro hac vice*)
 Luke Nikas (admitted *pro hac vice*)
 Christopher V. Fenlon (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 10 North Pearl Street, 4th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665
 Email: piovieno@bsflp.com
 anardacci@bsflp.com
 lnikas@bsflp.com
 cfenlon@bsflp.com

Counsel for Plaintiff Marta Cooperative of America, Inc.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

This Document Relates To Individual Case No.
 3:11-cv-05530-SC (N.D. Cal.)

MARTA COOPERATIVE OF
 AMERICA, INC.,

Plaintiff,

vs.

HITACHI LTD., et al.,

Defendants.

Case No. 3:11-cv-05530-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

**MARTA COOPERATIVE OF AMERICA,
 INC.'S OBJECTIONS AND RESPONSES
 TO DEFENDANTS TOSHIBA AMERICA
 ELECTRONIC COMPONENTS, INC.'S
 AND PHILIPS ELECTRONICS NORTH
 AMERICA CORPORATION'S FIRST
 REQUESTS FOR PRODUCTION OF
 DOCUMENTS**

PROPOUNDING PARTIES:

Toshiba America Electronic Components, Inc.
and Philips Electronics North America
Corporation

RESPONDING PARTY:

Marta Cooperative of America, Inc.

SET:

One

REQUEST NO. 23:

All Documents relating to your suspicion or belief that any Defendant was engaged in any anticompetitive conduct relating to CRTs or CRT Products, including the date You first suspected such conduct and the circumstances surrounding, and reasons for, such suspicions or beliefs.

RESPONSE TO REQUEST NO. 23:

Marta refers to and incorporates its General Objections as if set forth fully herein. Marta further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege, the work product doctrine, and/or any other protection or privilege. Marta also objects to this Request on the ground that it is overly broad, unduly burdensome, vague, and ambiguous.

Subject to and notwithstanding the foregoing objections, Marta will produce responsive, non-privileged documents created during the period of March 1, 1995 through November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of business, based on a search of the files of an agreed upon list of custodians and search terms to be negotiated by the parties.

REQUEST NO. 24:

Without limitation as to time, all Documents relating to any statement or action by any Defendant, or any other Person or entity that You contend had the effect of concealing any of Your claims.

RESPONSE TO REQUEST NO. 24:

Marta refers to and incorporates its General Objections as if set forth fully herein. Marta further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege, the work product doctrine, and/or any other protection or privilege. Marta also objects to this Request on the ground that it is overly broad, unduly burdensome, vague, and ambiguous.

Subject to and notwithstanding the foregoing objections, Marta will produce responsive, non-privileged documents created during the period of March 1, 1995 through November 25, 2007

1 to the extent that such documents exist and are kept in the ordinary course of business, based on a
2 search of the files of an agreed upon list of custodians and search terms to be negotiated by the
3 parties.

4 **REQUEST NO. 25:**

5 Without limitation as to time, all Documents concerning any steps or actions taken by
6 You to discover the facts alleged in the Complaint that You contend support Your claims.

7 **RESPONSE TO REQUEST NO. 25:**

8 Marta refers to and incorporates its General Objections as if set forth fully herein. Marta
9 further objects to this Request on the grounds that it seeks information that is protected by the
10 attorney-client privilege, the work product doctrine, and/or any other protection or privilege. Marta
11 also objects to this Request on the ground that it is overly broad, unduly burdensome, vague, and
12 ambiguous.

13 Subject to and notwithstanding the foregoing objections, Marta will produce responsive,
14 non-privileged documents created during the period of March 1, 1995 through November 25, 2007
15 to the extent that such documents exist and are kept in the ordinary course of business, based on a
16 search of the files of an agreed upon list of custodians and search terms to be negotiated by the
17 parties.

18 **REQUEST NO. 26:**

19 All Documents relating to the sharing of information between manufacturers of CRTs.

20 **RESPONSE TO REQUEST NO. 26:**

21 Marta refers to and incorporates its General Objections as if set forth fully herein. Marta
22 further objects to this Request on the grounds that it is overly broad, unduly burdensome and
23 oppressive, seeks or calls for the production of documents that are equally available to Defendants
24 or are irrelevant to the claims or defenses of any party, and is not calculated to lead to the
25 discovery of admissible evidence.

26 Subject to and notwithstanding the foregoing objections, Marta will produce responsive,
27 non-privileged documents created during the period of March 1, 1995 through November 25, 2007
28 to the extent that such documents exist and are kept in the ordinary course of business, based on a

1 litigation. Such documents are either already in Defendants' possession, or can be obtained from
2 another source that is more convenient, less burdensome, or less expensive.

3
4 As to the Objections:

5 DATED: August 17, 2012

/s/ Philip J. Iovieno

6 William A. Isaacson (admitted *pro hac vice*)
7 Melissa Felder (admitted *pro hac vice*)
8 BOIES, SCHILLER & FLEXNER LLP
9 5301 Wisconsin Ave. NW, Suite 800
10 Washington, D.C. 20015
11 Telephone: (202) 237-2727
12 Facsimile: (202) 237-6131
13 Email: wisaacson@bsflp.com
14 mfelder@bsflp.com

15 Philip J. Iovieno (admitted *pro hac vice*)
16 Anne M. Nardacci (admitted *pro hac vice*)
17 Luke M. Nikas (admitted *pro hac vice*)
18 Christopher V. Fenlon (admitted *pro hac vice*)
19 BOIES, SCHILLER & FLEXNER LLP
20 10 North Pearl Street, 4th Floor
21 Albany, NY 12207
22 Telephone: (518) 434-0600
23 Facsimile: (518) 434-0665
24 Email: piovieno@bsflp.com
25 anardacci@bsflp.com
26 lnikas@bsflp.com
27 cfenlon@bsflp.com

28
Counsel for Plaintiff
Marta Cooperative of America, Inc.

EXHIBIT G

William A. Isaacson (admitted *pro hac vice*)
 Melissa Felder (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, D.C. 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 Email: wisaacson@bsflp.com
 mfelder@bsflp.com

Philip J. Iovieno (admitted *pro hac vice*)
 Anne M. Nardacci (admitted *pro hac vice*)
 Luke Nikas (admitted *pro hac vice*)
 Christopher V. Fenlon (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 10 North Pearl Street, 4th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665
 Email: piovieno@bsflp.com
 anardacci@bsflp.com
 lnikas@bsflp.com
 cfenlon@bsflp.com

Counsel for Plaintiff
 P.C. Richard & Son Long Island Corporation

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

This Document Relates To Individual Case No.
 3:11-cv-05530-SC (N.D. Cal.)

P.C. RICHARD & SON LONG ISLAND
 CORPORATION,

Plaintiff,

vs.

HITACHI LTD., et al.,

Defendants.

Case No. 3:11-cv-05530-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

**P.C. RICHARD & SON LONG ISLAND
 CORPORATION'S OBJECTIONS AND
 RESPONSES TO DEFENDANTS
 TOSHIBA AMERICA ELECTRONIC
 COMPONENTS, INC.'S AND PHILIPS
 ELECTRONICS NORTH AMERICA
 CORPORATION'S FIRST REQUESTS
 FOR PRODUCTION OF DOCUMENTS**

PROPOUNDING PARTIES:

Toshiba America Electronic Components, Inc.
and Philips Electronics North America
Corporation

RESPONDING PARTY:

P.C. Richard & Son Long Island Corporation

SET:

One

1 available to Defendants or are irrelevant to the claims or defenses of any party, and is not
 2 calculated to lead to the discovery of admissible evidence. P.C. Richard also objects to the terms
 3 “revenue”, “costs”, “profitability”, and “margins” as being vague and ambiguous.

4 **REQUEST NO. 23:**

5 All Documents relating to your suspicion or belief that any Defendant was engaged in
 6 any anticompetitive conduct relating to CRTs or CRT Products, including the date You first
 7 suspected such conduct and the circumstances surrounding, and reasons for, such suspicions
 8 or beliefs.

9 **RESPONSE TO REQUEST NO. 23:**

10 P.C. Richard refers to and incorporates its General Objections as if set forth fully herein.
 11 P.C. Richard further objects to this Request on the grounds that it seeks information that is
 12 protected by the attorney-client privilege, the work product doctrine, and/or any other protection or
 13 privilege. P.C. Richard also objects to this Request on the ground that it is overly broad, unduly
 14 burdensome, vague, and ambiguous.

15 Subject to and notwithstanding the foregoing objections, P.C. Richard will produce
 16 responsive, non-privileged documents created during the period of March 1, 1995 through
 17 November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of
 18 business, based on a search of the files of an agreed upon list of custodians and search terms to be
 19 negotiated by the parties.

20 **REQUEST NO. 24:**

21 Without limitation as to time, all Documents relating to any statement or action by any
 22 Defendant, or any other Person or entity that You contend had the effect of concealing any of
 23 Your claims.

24 **RESPONSE TO REQUEST NO. 24:**

25 P.C. Richard refers to and incorporates its General Objections as if set forth fully herein.
 26 P.C. Richard further objects to this Request on the grounds that it seeks information that is
 27 protected by the attorney-client privilege, the work product doctrine, and/or any other protection or
 28

1 privilege. P.C. Richard also objects to this Request on the ground that it is overly broad, unduly
2 burdensome, vague, and ambiguous.

3 Subject to and notwithstanding the foregoing objections, P.C. Richard will produce
4 responsive, non-privileged documents created during the period of March 1, 1995 through
5 November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of
6 business, based on a search of the files of an agreed upon list of custodians and search terms to be
7 negotiated by the parties.

8 **REQUEST NO. 25:**

9 Without limitation as to time, all Documents concerning any steps or actions taken by
10 You to discover the facts alleged in the Complaint that You contend support Your claims.

11 **RESPONSE TO REQUEST NO. 25:**

12 P.C. Richard refers to and incorporates its General Objections as if set forth fully herein.
13 P.C. Richard further objects to this Request on the grounds that it seeks information that is
14 protected by the attorney-client privilege, the work product doctrine, and/or any other protection or
15 privilege. P.C. Richard also objects to this Request on the ground that it is overly broad, unduly
16 burdensome, vague, and ambiguous.

17 Subject to and notwithstanding the foregoing objections, P.C. Richard will produce
18 responsive, non-privileged documents created during the period of March 1, 1995 through
19 November 25, 2007 to the extent that such documents exist and are kept in the ordinary course of
20 business, based on a search of the files of an agreed upon list of custodians and search terms to be
21 negotiated by the parties.

22 **REQUEST NO. 26:**

23 All Documents relating to the sharing of information between manufacturers of CRTs.

24 **RESPONSE TO REQUEST NO. 26:**

25 P.C. Richard refers to and incorporates its General Objections as if set forth fully herein.
26 P.C. Richard further objects to this Request on the grounds that it is overly broad, unduly
27 burdensome and oppressive, seeks or calls for the production of documents that are equally
28

1 P.C. Richard refers to and incorporates its General Objections as if set forth fully herein. P.C.
 2 Richard further objects to this Request on the grounds that it is overly broad, unduly burdensome and
 3 oppressive, and seeks or calls for the production of documents that are either publicly available,
 4 available as part of the U.S. Department of Justice investigation, or were already produced in this
 5 litigation. Such documents are either already in Defendants' possession, or can be obtained from
 6 another source that is more convenient, less burdensome, or less expensive.

7
 8
 9 DATED: August 17, 2012

/s/ Philip J. Iovieno

William A. Isaacson (admitted *pro hac vice*)
 Melissa Felder (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, D.C. 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 Email: wisaacson@bsflp.com
 mfelder@bsflp.com

Philip J. Iovieno (admitted *pro hac vice*)
 Anne M. Nardacci (admitted *pro hac vice*)
 Luke M. Nikas (admitted *pro hac vice*)
 Christopher V. Fenlon (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 10 North Pearl Street, 4th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665
 Email: piovieno@bsflp.com
 anardacci@bsflp.com
 lnikas@bsflp.com
 cfenlon@bsflp.com

Counsel for Plaintiff
P.C. Richard & Son Long Island Corporation

EXHIBIT H

William A. Isaacson (admitted *pro hac vice*)
 Melissa Felder (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, D.C. 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 Email: wisaacson@bsfllp.com
 mfelder@bsfllp.com

Philip J. Iovieno (admitted *pro hac vice*)
 Anne M. Nardacci (admitted *pro hac vice*)
 Luke Nikas (admitted *pro hac vice*)
 Christopher V. Fenlon (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 10 North Pearl Street, 4th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665
 Email: piovieno@bsfllp.com
 anardacci@bsfllp.com
 lnikas@bsfllp.com
 cfenlon@bsfllp.com

Counsel for Plaintiff
 Schultze Agency Services, LLC on behalf of
 Tweeter Opco, LLC and Tweeter Newco, LLC

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

This Document Relates To Individual Case No.
 3:11-cv-05528-SC (N.D. Cal.)

SCHULTZE AGENCY SERVICES, LLC
 ON BEHALF OF TWEETER OPKO, LLC
 AND TWEETER NEWCO, LLC,

Plaintiffs,

vs.

HITACHI LTD., et al.,

Defendants.

Case No. 3:11-cv-05528-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

**SCHULTZE AGENCY SERVICES, LLC
 ON BEHALF OF TWEETER OPKO, LLC
 AND TWEETER NEWCO, LLC'S
 OBJECTIONS AND RESPONSES TO
 DEFENDANTS LG ELECTRONICS,
 INC.'S AND PANASONIC
 CORPORATION OF NORTH
 AMERICA'S FIRST REQUESTS FOR
 PRODUCTION OF DOCUMENTS**

PROPOUNDING PARTIES:

Hitachi Electronic Devices (USA), Inc. and
Samsung SDI America, Inc.

RESPONDING PARTY:

Schultze Agency Services, LLC on behalf of
Tweeter Opco, LLC and Tweeter Newco, LLC.

SET:

One

1 All DOCUMENTS relating to your suspicion or belief that any DEFENDANT was
2 engaged in any anticompetitive conduct relating to CRTs or CRT PRODUCTS, including the date
3 YOU first suspected such conduct and the circumstances surrounding, and reasons for, such
4 suspicions or beliefs.

5 **RESPONSE TO REQUEST NO. 24:**

6 Tweeter refers to and incorporates its General Objections as if set forth fully herein.
7 Tweeter further objects to this Request on the grounds that it seeks information that is protected by
8 the attorney-client privilege, the work product doctrine, and/or any other protection or privilege.
9 Tweeter also objects to this Request on the ground that it is overly broad, unduly burdensome,
10 vague, and ambiguous.

11 Subject to and notwithstanding the foregoing objections, Tweeter will produce responsive,
12 non-privileged documents created during the period of March 1, 1995 through November 25, 2007
13 to the extent that such documents exist and are kept in the ordinary course of business, based on a
14 search of the files of an agreed upon list of custodians and search terms to be negotiated by the
15 parties.

16 **REQUEST NO. 25:**

17 Without limitation as to time, all DOCUMENTS relating to any statement or
18 action by any DEFENDANT, or any other PERSON or entity that YOU contend had the
19 effect of concealing any of YOUR claims.

20 **RESPONSE TO REQUEST NO. 25:**

21 Tweeter refers to and incorporates its General Objections as if set forth fully herein.
22 Tweeter further objects to this Request on the grounds that it seeks information that is protected by
23 the attorney-client privilege, the work product doctrine, and/or any other protection or privilege.
24 Tweeter also objects to this Request on the ground that it is overly broad, unduly burdensome,
25 vague, and ambiguous.

26 Subject to and notwithstanding the foregoing objections, Tweeter will produce responsive,
27 non-privileged documents created during the period of March 1, 1995 through November 25, 2007
28 to the extent that such documents exist and are kept in the ordinary course of business, based on a

1 search of the files of an agreed upon list of custodians and search terms to be negotiated by the
2 parties.

3 **REQUEST NO. 26:**

4 Without limitation as to time, all DOCUMENTS concerning any steps or actions taken by
5 YOU to discover the facts alleged in the COMPLAINT that YOU contend support YOUR claims.

6 **RESPONSE TO REQUEST NO. 26:**

7 Tweeter refers to and incorporates its General Objections as if set forth fully herein.
8 Tweeter further objects to this Request on the grounds that it seeks information that is protected by
9 the attorney-client privilege, the work product doctrine, and/or any other protection or privilege.
10 Tweeter also objects to this Request on the ground that it is overly broad, unduly burdensome,
11 vague, and ambiguous.

12 Subject to and notwithstanding the foregoing objections, Tweeter will produce responsive,
13 non-privileged documents created during the period of March 1, 1995 through November 25, 2007
14 to the extent that such documents exist and are kept in the ordinary course of business, based on a
15 search of the files of an agreed upon list of custodians and search terms to be negotiated by the
16 parties.

17 **REQUEST NO. 27:**

18 All DOCUMENTS relating to the sharing of information between manufacturers of CRTs.

19 **RESPONSE TO REQUEST NO. 27:**

20 Tweeter refers to and incorporates its General Objections as if set forth fully herein.
21 Tweeter further objects to this Request on the grounds that it is overly broad, unduly burdensome
22 and oppressive, seeks or calls for the production of documents that are equally available to
23 Defendants or are irrelevant to the claims or defenses of any party, and is not calculated to lead to
24 the discovery of admissible evidence.

25 Subject to and notwithstanding the foregoing objections, Tweeter will produce responsive,
26 non-privileged documents created during the period of March 1, 1995 through November 25, 2007
27 to the extent that such documents exist and are kept in the ordinary course of business, based on a
28

1 litigation. Such documents are either already in Defendants' possession, or can be obtained from
2 another source that is more convenient, less burdensome, or less expensive.

3
4 DATED: August 17, 2012

/s/ Philip J. Iovieno

William A. Isaacson (admitted *pro hac vice*)
Melissa Felder (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsfllp.com
mfelder@bsfllp.com

Philip J. Iovieno (admitted *pro hac vice*)
Anne M. Nardacci (admitted *pro hac vice*)
Luke M. Nikas (admitted *pro hac vice*)
Christopher V. Fenlon (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
10 North Pearl Street, 4th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsfllp.com
anardacci@bsfllp.com
lnikas@bsfllp.com
cfenlon@bsfllp.com

Counsel for Plaintiffs
Schultze Agency Services, LLC on behalf of
Tweeter Opco, LLC and Tweeter Newco, LLC

EXHIBIT I

1 Jason C. Murray (CA Bar No. 169806)
2 CROWELL & MORING LLP
3 515 South Flower St., 40th Floor
4 Los Angeles, CA 90071
5 Telephone: 213-622-4750
6 Facsimile: 213-622-2690
7 Email: jmurray@crowell.com

8
9 Counsel for Plaintiffs
10 *Target Corp.; Sears, Roebuck and Co.;*
11 *Kmart Corp.; Old Comp Inc.; Good*
12 *Guys, Inc.; and RadioShack Corp.*

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 IN RE CATHODE RAY TUBE (CRT)
14 ANTITRUST LITIGATION

15 This Document Relates To:

16 *Target Corp., et al. v. Chunghwa*
17 *Picture Tubes, Ltd., et al., Case No.*
18 *3:11-CV 11-05514-SC*

CASE NO. 3:11-CV 11-05514-SC

MASTER FILE NO. CV 07-5944-SC

MDL NO. 1917

**PLAINTIFF TARGET CORP.'S
RESPONSES AND OBJECTIONS TO
DEFENDANTS TATUNG COMPANY OF
AMERICA, INC. AND SAMSUNG
ELECTRONICS CO., LTD.'S FIRST SET
OF REQUESTS FOR PRODUCTION OF
DOCUMENTS**

22 PROPOUNDING PARTY: Defendants Tatung Company of America, Inc. and Samsung
23 Electronics Co., Ltd

24 RESPONDING PARTY: Plaintiff Target Corp.

25 SET NO.: ONE
26
27
28

1 available to Defendants, or can be obtained from another source that is more convenient, less
 2 burdensome, or less expensive. Target further objects to this Request as vague and ambiguous;
 3 specifically, the references to “revenue, costs, profitability and margins” are vague and
 4 ambiguous.

5 Subject to and without waiving any of the foregoing objections, Target offers to meet and
 6 confer with Defendants regarding the scope of this Request.

7 **REQUEST NO. 24:**

8 All Documents relating to your suspicion or belief that any Defendant was engaged in any
 9 anticompetitive conduct relating to CRTs or CRT Products, including the date You first suspected
 10 such conduct and the circumstances surrounding, and reasons for, such suspicions or beliefs.

11 **RESPONSE TO REQUEST NO. 24:**

12 Target refers to and incorporates its General Objections as though set forth fully herein.
 13 Target further objects to this Request on the grounds that it is overly broad, unduly burdensome
 14 and oppressive. Target further objects that this Request seeks documents that are equally
 15 available to Defendants, or can be obtained from another source that is more convenient, less
 16 burdensome, or less expensive. Target further objects to this Request on the grounds and to the
 17 extent that the Request seeks information protected by the attorney client privilege, the attorney
 18 work-product doctrine, or any other available privilege or protection. Target further objects to
 19 this Request as vague and ambiguous; specifically, the reference to “suspicion,” “belief,” and
 20 “anticompetitive conduct,” are vague and ambiguous.

21 Subject to and without waiving any of the foregoing objections, Target offers to meet and
 22 confer with Defendants regarding the scope of this Request.

23 **REQUEST NO. 25:**

24 Without limitation as to time, all Documents relating to any statement or action by any
 25 Defendant, or any other Person or entity that You contend had the effect of concealing any of
 26 Your claims.

27 **RESPONSE TO REQUEST NO. 25:**

28 Target refers to and incorporates its General Objections as though set forth fully herein.

Target further objects to this Request on the grounds that it is overly broad, unduly burdensome and oppressive. Target further objects that this Request calls for premature contention discovery. Target further objects that this Request seeks documents that are equally available to Defendants, particularly to the extent it seeks documents that are either publicly available or are in the possession of Defendants and their co-conspirators. Target further objects to this Request on the grounds that it calls for a legal conclusion. Target further objects to this Request on the grounds and to the extent that the Request seeks information protected by the attorney client privilege, the attorney work-product doctrine, or any other available privilege or protection. Target further objects to this Request as vague and ambiguous; specifically, the reference to “concealing” is vague and ambiguous.

Subject to and without waiving any of the foregoing objections, Target offers to meet and confer with Defendants regarding the scope of this Request.

REQUEST NO. 26:

Without limitation as to time, all Documents concerning any steps or actions taken by YOU to discover the facts alleged in the Complaint that You contend support Your claims.

RESPONSE TO REQUEST NO. 26:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects to this Request on the grounds that it is overly broad, unduly burdensome and oppressive. Target further objects that this Request calls for premature contention discovery. Target further objects to this Request on the grounds and to the extent that the Request seeks information protected by the attorney client privilege, the attorney work-product doctrine, or any other available privilege or protection.

Subject to and without waiving any of the foregoing objections, Target offers to meet and confer with Defendants regarding the scope of this Request.

REQUEST NO. 27:

All Documents relating to the sharing of information between manufacturers of CRTs.

RESPONSE TO REQUEST NO. 27:

Target refers to and incorporates its General Objections as though set forth fully herein.

1 **REQUEST NO. 33:**

2 Documents sufficient to Identify all purposes for which You purchased or used CRTs and
3 CRT Products.

4 **RESPONSE TO REQUEST NO. 33:**

5 Target refers to and incorporates its General Objections as though set forth fully herein.
6 Target further objects to this Request on the grounds that it is overly broad and seeks documents
7 that are irrelevant to the claims or defenses of any party and is not reasonably calculated to lead to
8 the discovery of admissible evidence. Target further objects to this Request on the grounds that it
9 is unduly burdensome and oppressive.

10 **REQUEST NO. 34:**

11 All Documents relating to the allegations contained in paragraph 173 of the Complaint.

12 **RESPONSE TO REQUEST NO. 34:**

13 Target refers to and incorporates its General Objections as though set forth fully herein.
14 Target further objects to this Request on the grounds that it is overly broad, unduly burdensome,
15 and oppressive. Target further objects that this Request seeks documents that are equally
16 available to Defendants, or can be obtained from another source that is more convenient, less
17 burdensome, or less expensive. Target further objects to this Request on the grounds and to the
18 extent that the Request seeks information protected by the attorney client privilege, the attorney
19 work-product doctrine, or any other available privilege or protection.

20
21 DATED: August 17, 2012

22
23 */s/ Jason C. Murray*

24 Jason C. Murray
CROWELL & MORING LLP

25 *Counsel for Plaintiffs*
26 *Target Corp.; Sears, Roebuck and Co.;*
27 *Kmart Corp.; Old Comp Inc.; Good*
28 *Guys, Inc.; and RadioShack Corp.*

EXHIBIT J

Stuart H. Singer (admitted *pro hac vice*)
 Meredith L. Schultz (admitted *pro hac vice*)
 BOIES, SCHILLER, & FLEXNER LLP
 401 East Las Olas Boulevard, Suite 1200
 Fort Lauderdale, FL 33301
 Telephone: (954) 356-0011
 Facsimile: (954) 356-0022
 Email: ssinger@bsfllp.com
 mschultz@bsfllp.com

William A. Isaacson (admitted *pro hac vice*)
 Melissa Felder (admitted *pro hac vice*)
 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, D.C. 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 Email: wisaacson@bsfllp.com
 mfelder@bsfllp.com

Counsel for Plaintiff Office Depot, Inc.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

This Document Relates To Individual Case No.
 3:11-cv-06276-SC (N.D. Cal.)

Case No. 3:11-cv-06276-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

OFFICE DEPOT, INC.,

Plaintiff,

vs.

HITACHI LTD., et al.,

Defendants.

**OFFICE DEPOT'S OBJECTIONS AND
 RESPONSES TO DEFENDANTS
 TOSHIBA AMERICA ELECTRONIC
 COMPONENTS, INC.'S AND PHILIPS
 ELECTRONICS NORTH AMERICA
 CORPORATION'S FIRST REQUESTS
 FOR PRODUCTION OF DOCUMENTS**

PROPOUNDING PARTIES:

Defendants Samsung Electronics Co., Ltd. and
 Tatung Company of America, Inc.

RESPONDING PARTY:

Office Depot, Inc.

SET:

One

1 objects to the terms “revenue”, “costs”, “profitability”, and “margins” as being vague and
2 ambiguous.

3 Subject to and notwithstanding the foregoing objections, Office Depot states that its
4 relevant financial information is publicly available.

5 **REQUEST NO. 24:**

6 All Documents relating to your suspicion or belief that any Defendant was engaged
7 in any anticompetitive conduct relating to CRTs or CRT Products, including the date You first
8 suspected such conduct and the circumstances surrounding, and reasons for, such suspicions or
9 beliefs.

10 **RESPONSE TO REQUEST NO. 24:**

11 Office Depot refers to and incorporates its General Objections as if set forth fully herein.
12 Office Depot further objects to this Request on the grounds that it seeks information that is
13 protected by the attorney-client privilege, the work product doctrine, and/or any other protection or
14 privilege. Office Depot also objects to this Request on the ground that it is overly broad, unduly
15 burdensome, vague, and ambiguous.

16 Subject to and notwithstanding the foregoing objections, Office Depot will produce
17 relevant, non-privileged documents created during the period of March 1, 1995 through November
18 25, 2007 to the extent that such documents exist and are kept in the ordinary course of business,
19 based on a search of the files of an agreed upon list of custodians and search terms to be negotiated
20 by the parties.

21 **REQUEST NO. 25:**

22 Without limitation as to time, all Documents relating to any statement or action by
23 any Defendant, or any other Person or entity that You contend had the effect of concealing any of
24 Your claims.

25 **RESPONSE TO REQUEST NO. 25:**

26 Office Depot refers to and incorporates its General Objections as if set forth fully herein.
27 Office Depot further objects to this Request on the grounds that it seeks information that is
28 protected by the attorney-client privilege, the work product doctrine, and/or any other protection or

1 privilege. Office Depot also objects to this Request on the ground that it is overly broad, unduly
2 burdensome, vague, and ambiguous.

3 Subject to and notwithstanding the foregoing objections, Office Depot will produce
4 relevant, non-privileged documents created during the period of March 1, 1995 through November
5 25, 2007 to the extent that such documents exist and are kept in the ordinary course of business,
6 based on a search of the files of an agreed upon list of custodians and search terms to be negotiated
7 by the parties.

8 **REQUEST NO. 26:**

9 Without limitation as to time, all Documents concerning any steps or actions taken
10 by You to discover the facts alleged in the Complaint that You contend support Your claims.

11 **RESPONSE TO REQUEST NO. 26:**

12 Office Depot refers to and incorporates its General Objections as if set forth fully herein.
13 Office Depot further objects to this Request on the grounds that it seeks information that is
14 protected by the attorney-client privilege, the work product doctrine, and/or any other protection or
15 privilege. Office Depot also objects to this Request on the ground that it is overly broad, unduly
16 burdensome, vague, and ambiguous.

17 Subject to and notwithstanding the foregoing objections, Office Depot will produce
18 relevant, non-privileged documents created during the period of March 1, 1995 through November
19 25, 2007 to the extent that such documents exist and are kept in the ordinary course of business,
20 based on a search of the files of an agreed upon list of custodians and search terms to be negotiated
21 by the parties.

22 **REQUEST NO. 27:**

23 All Documents relating to the sharing of information between manufacturers of
24 CRTs.

25 **RESPONSE TO REQUEST NO. 27:**

26 Office Depot refers to and incorporates its General Objections as if set forth fully herein.
27 Office Depot further objects to this Request, including the time frame for this Request, on the
28 grounds that it is overly broad, unduly burdensome and oppressive, seeks or calls for the

DATED: August 31, 2012

/s/ Stuart H. Singer

Stuart H. Singer (admitted *pro hac vice*)
Meredith L. Schultz (admitted *pro hac vice*)
BOIES, SCHILLER, & FLEXNER LLP
401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Facsimile: (954) 356-0022
Email: ssinger@bsfllp.com
mschultz@bsfllp.com

William A. Isaacson (admitted *pro hac vice*)
Melissa Felder (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsfllp.com
mfelder@bsfllp.com

Philip J. Iovieno (admitted *pro hac vice*)
Anne M. Nardacci (admitted *pro hac vice*)
Luke M. Nikas (admitted *pro hac vice*)
Christopher V. Fenlon (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
10 North Pearl Street, 4th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsfllp.com
anardacci@bsfllp.com
lnikas@bsfllp.com
cfenlon@bsfllp.com

*Counsel for Plaintiff
Office Depot Inc.*

EXHIBIT K

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
 Roman M. Silberfeld, Bar No. 62783
 RMSilberfeld@rkmc.com
 David Martinez, Bar No. 193183
 DMartinez@rkmc.com
 2049 Century Park East, Suite 3400
 Los Angeles, CA 90067-3208
 Telephone: 310-552-0130
 Facsimile: 310-229-5800

Attorneys for Plaintiffs

BEST BUY CO., INC.; BEST BUY PURCHASING
 LLC; BEST BUY ENTERPRISE SERVICES, INC.;
 BEST BUY STORES, L.P.; BESTBUY.COM,
 LLC.; MAGNOLIA HI-FI, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. M:07-5994-SC
 MDL No. 1917

This Document Relates to
 Individual Case No. 3:11-cv-05513-SC

Case No. 3:11-cv-05513-SC

BEST BUY CO., INC.; BEST BUY
 PURCHASING LLC; BEST BUY
 ENTERPRISE SERVICES, INC.; BEST BUY
 STORES, L.P.; BESTBUY.COM, L.L.C.; and
 MAGNOLIA HI-FI, INC.,

Plaintiffs,

v.

HITACHI, LTD.; HITACHI DISPLAYS, LTD.;
 HITACHI AMERICA, LTD.; HITACHI ASIA,
 LTD.; HITACHI ELECTRONIC DEVICES
 (USA), INC.; SHENZHEN SEG HITACHI
 COLOR DISPLAY DEVICES, LTD.; IRICO
 GROUP CORPORATION; IRICO GROUP
 ELECTRONICS CO., LTD.; IRICO DISPLAY
 DEVICES CO., LTD.; LG ELECTRONICS,
 INC.; LG ELECTRONICS USA, INC.; LG
 ELECTRONICS TAIWAN TAIPEI CO., LTD.;
 LP DISPLAYS INTERNATIONAL LTD.;

(CONTINUED ON NEXT PAGE)

**PLAINTIFF'S RESPONSES TO
 DEFENDANTS PANASONIC
 CORPORATION'S AND LG
 ELECTRONICS, INC.'S FIRST SET
 OF REQUESTS FOR PRODUCTION
 OF DOCUMENTS**

PANASONIC CORPORATION; PANASONIC CORPORATION OF NORTH AMERICA; MT PICTURE DISPLAY CO., LTD.; BEIJING MATSUSHITA COLOR CRT CO., LTD.; KONINKLIJKE PHILIPS ELECTRONICS N.V.; PHILIPS ELECTRONICS NORTH AMERICA CORPORATION; PHILIPS ELECTRONICS INDUSTRIES (TAIWAN), LTD.; PHILIPS DA AMAZONIA INDUSTRIA ELECTRONICA LTDA.; SAMTEL COLOR LTD.; THAI CRT CO., LTD.; TOSHIBA CORPORATION; TOSHIBA AMERICA, INC.; TOSHIBA AMERICA CONSUMER PRODUCTS, LLC; TOSHIBA AMERICA ELECTRONIC COMPONENTS, INC.; TOSHIBA AMERICA INFORMATION SYSTEMS, INC.; CHUNGHWA PICTURE TUBES, LTD.; CHUNGHWA PICTURE TUBES (MALAYSIA); TATUNG COMPANY OF AMERICA, INC.,

Defendants.

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

GENERAL OBJECTIONS

Plaintiffs Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; BestBuy.com, L.L.C.; Magnolia Hi-Fi, Inc. (collectively “Best Buy”) assert and incorporate by reference the following General Objections to each Request for Production of Document (“Request(s)”). Reference to these General Objections in any specific Request shall not waive or otherwise limit the applicability of these General Objections to each and every Request.

1. Best Buy construes Defendants’ Requests as served on behalf of all defendants named in the Complaint (“Defendants”) and responds and objects accordingly.

2. Best Buy objects to Defendants’ “Definitions” to the extent that they impose burdens and obligations on Best Buy greater than or different from those authorized under the Federal Rules of Civil Procedure and the Local Rules of this Court and to the extent they purport to give meanings to words different from their ordinary English meaning or definitions set forth in the applicable statutes or rules.

1 without waiving these objections, Best Buy points Defendants to the data it is producing in
2 response to Request No. 2.

3 **REQUEST NO. 24:** All Documents relating to your suspicion or belief that any
4 Defendant was engaged in any anticompetitive conduct relating to CRTs or CRT Products,
5 including the date You first suspected such conduct and the circumstances surrounding, and
6 reasons for, such suspicions or beliefs.

7 **RESPONSE:**

8 In addition to Best Buy's General Objections, which Best Buy hereby incorporates by
9 reference, Best Buy specifically objects to this Request on the grounds that it is overly broad,
10 unduly burdensome and calls for production of documents protected from disclosure under the
11 attorney-client privilege and other privileges and the work-product doctrine. Best Buy further
12 objects to this Request on the grounds that it is overbroad, unduly burdensome, particularly
13 insofar as it seeks documents that are either publicly available or were produced in this litigation
14 to Best Buy by Defendants and their co-conspirators. Such documents are either already in the
15 possession of Defendants, or can be obtained by Defendants from another source that is more
16 convenient, less burdensome, or less expensive. Best Buy further objects to this Request as
17 premature contention discovery, particularly given that discovery is in its early stages and Best
18 Buy's factual investigation is continuing.

19 **REQUEST NO. 25:** Without limitation as to time, all Documents relating to any
20 statement or action by any Defendant, or any other Person or entity that You contend had the
21 effect of concealing any of Your claims.

22 **RESPONSE:**

23 In addition to Best Buy's General Objections, which Best Buy hereby incorporates by
24 reference, Best Buy specifically objects to this Request on the ground that the term "concerning
25 any statement or action" as used herein is overbroad and unduly burdensome. Best Buy further
26 objects to this Request on the ground that the phrase "concealing any of Your claims" as used
27 herein calls for a legal conclusion regarding what is deemed "concealing" under the law. Best
28 Buy also objects to this Request on the ground that the term "concealing" as used herein is vague

1 and ambiguous, and taken to its logical conclusion would include every communication between
 2 Best Buy and Defendants. Best Buy further objects to this Request on the grounds that it is
 3 overbroad, unduly burdensome, particularly insofar as it seeks documents that are either publicly
 4 available or were produced in this litigation to Best Buy by Defendants and their co-conspirators.
 5 Such documents are either already in the possession of Defendants, or can be obtained by
 6 Defendants from another source that is more convenient, less burdensome, or less expensive. Best
 7 Buy further objects to this Request as premature contention discovery, particularly given that
 8 discovery is in its early stages and Best Buy's factual investigation is continuing.

9 **REQUEST NO. 26:** Without limitation as to time, all Documents concerning any steps or
 10 actions taken by You to discover the facts alleged in the Complaint that You contend support
 11 Your claims.

12 **RESPONSE:**

13 In addition to Best Buy's General Objections, which Best Buy hereby incorporates by
 14 reference, Best Buy specifically objects to this Request on the grounds that it is overly broad,
 15 unduly burdensome and calls for production of documents protected from disclosure under the
 16 attorney-client privilege and other privileges and the work-product doctrine. Best Buy further
 17 objects to this Request on the grounds that it is overbroad, unduly burdensome, particularly
 18 insofar as it seeks documents that are either publicly available or were produced in this litigation
 19 to Best Buy by Defendants and their co-conspirators. Such documents are either already in the
 20 possession of Defendants, or can be obtained by Defendants from another source that is more
 21 convenient, less burdensome, or less expensive. Best Buy further objects to this Request as
 22 premature contention discovery, particularly given that discovery is in its early stages and Best
 23 Buy's factual investigation is continuing.

24 **REQUEST NO. 27:** All Documents relating to the sharing of information between
 25 manufacturers of CRTs.

26 **RESPONSE:**

27 In addition to Best Buy's General Objections, which Best Buy hereby incorporates by
 28 reference, Best Buy specifically objects to this Request to the extent that it seeks information that

1 other features.

2 **RESPONSE:**

3 Best Buy incorporates by reference its objections and response to Request No. 3.

4 DATED: August 17, 2012

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

5 By: /s/ Laura E. Nelson

6 Roman M. Silberfeld

7 David Martinez

8 Laura E. Nelson

9 Lauren E. Wood

ATTORNEYS FOR PLAINTIFFS

**BEST BUY CO., INC.; BEST BUY PURCHASING
10 LLC; BEST BUY ENTERPRISE SERVICES, INC.;
11 BEST BUY STORES, L.P.; BESTBUY.COM, LLC;
12 MAGNOLIA HI-FI, INC.**

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

EXHIBIT L

David J. Burman (admitted *pro hac vice*)
 Nick Hesterberg (admitted *pro hac vice*)
 Eric J. Weiss
PERKINS COIE LLP
 1201 Third Avenue, Suite 4900
 Seattle, WA 98101-3099
 Telephone: 206.359.8000
 Facsimile: 206.359.9000

Joren Bass, Bar No. 208143
 JBass@perkinscoie.com
PERKINS COIE LLP
 Four Embarcadero Center, Suite 2400
 San Francisco, CA 94111-4131
 Telephone: 415.344.7120
 Facsimile: 415.344.7320

Attorneys for Plaintiff
Costco Wholesale Corporation

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

**IN RE CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION**

Case No. 07-5944 SC
 MDL No. 1917

This Document Relates to:

COSTCO ACTION
 3:11-cv-06397-SC

**COSTCO WHOLESALE
 CORPORATION'S RESPONSES AND
 OBJECTIONS TO PHILIPS
 ELECTRONICS NORTH AMERICA
 CORPORATION AND TOSHIBA
 AMERICA ELECTRONIC
 COMPONENTS, INC.'S FIRST SET OF
 REQUESTS FOR PRODUCTION**

RESPONDING PARTY: Costco Wholesale Corporation
PROPOUNDING PARTY: Philips Electronics North America Corporation &
 Toshiba America Electronic Components, Inc.
SET: First

1 **REQUEST NO. 24:** All Documents relating to your suspicion or belief that any
2 Defendant was engaged in any anticompetitive conduct relating to CRTs or CRT Products,
3 including the date You first suspected such conduct and the circumstances surrounding, and
4 reasons for, such suspicions or beliefs.

5 **RESPONSE TO REQUEST NO. 24:** In addition to Costco's General Objections, which
6 Costco hereby incorporates by reference, Costco specifically objects to this Request on the
7 grounds that it is overbroad, unduly burdensome, oppressive, and seeks production of documents
8 protected from disclosure under the attorney-client privilege and other privileges or the work-
9 product doctrine. Costco further objects to this Request on the grounds that it is overbroad,
10 unduly burdensome, particularly insofar as it seeks documents that are either publicly available or
11 were produced in this litigation to Costco by Defendants and their co-conspirators. Such
12 documents are either already in the possession of Defendants, or can be obtained by Defendants
13 from another source that is more convenient, less burdensome, or less expensive. Costco further
14 objects to this Request as premature contention discovery, particularly given that discovery is in
15 its early stages and Costco's factual investigation is continuing.

16 Subject to and without waiving these objections, Costco offers to meet and confer with
17 Defendants regarding the scope of this request. Costco will thereafter produce responsive,
18 nonprivileged documents created during the period of March 1, 1995, through November 25,
19 2007, to the extent such documents exist and are kept in the ordinary course of business, based on
20 a search of the files of an agreed upon list of custodians and search terms to be negotiated by the
21 parties.

22
23 **REQUEST NO. 25:** Without limitation as to time, all Documents relating to any
24 statement or action by any Defendant, or any other Person or entity that You contend had the
25 effect of concealing any of Your claims.

26 **RESPONSE TO REQUEST NO. 25:** In addition to Costco's General Objections, which
27 Costco hereby incorporates by reference, Costco specifically objects to this Request on the
28

ground that the term “relating to any statement or action” as used herein is overbroad, unduly burdensome, and oppressive. Costco further objects to this Request on the ground that the phrase “concealing any of Your claims” as used herein calls for a legal conclusion regarding what is deemed “concealing” under the law. Costco also objects to the term “concealing” as vague and ambiguous and taken to its logical conclusion would include every communication between Costco and Defendants. Costco further objects to this Request on the grounds that it is overbroad, unduly burdensome, particularly insofar as it seeks documents that are either publicly available or were produced in this litigation to Costco by Defendants and their co-conspirators. Such documents are either already in the possession of Defendants, or can be obtained by Defendants from another source that is more convenient, less burdensome, or less expensive. Costco further objects to this Request as premature contention discovery, particularly given that discovery is in its early stages and Costco’s factual investigation is continuing.

Subject to and without waiving these objections, Costco offers to meet and confer with Defendants regarding the scope of this request. Costco will thereafter produce responsive, nonprivileged documents created during the period of March 1, 1995, through November 25, 2007, to the extent such documents exist and are kept in the ordinary course of business, based on a search of the files of an agreed upon list of custodians and search terms to be negotiated by the parties.

REQUEST NO. 26: Without limitation as to time, all Documents concerning any steps or actions taken by You to discover the facts alleged in the Complaint that You contend support Your claims.

RESPONSE TO REQUEST NO. 26: In addition to Costco’s General Objections, which Costco hereby incorporates by reference, Costco specifically objects to this Request on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks production of documents protected from disclosure under the attorney-client privilege and other privileges and the work-product doctrine. Costco further objects to this Request on the grounds that it is overbroad, unduly burdensome, particularly insofar as it seeks documents that are either publicly available or

1 were produced in this litigation to Costco by Defendants and their co-conspirators. Such
2 documents are either already in the possession of Defendants, or can be obtained by Defendants
3 from another source that is more convenient, less burdensome, or less expensive. Costco further
4 objects to this Request as premature contention discovery, particularly given that discovery is in
5 its early stages and Costco's factual investigation is continuing.

6 Subject to and without waiving these objections, Costco offers to meet and confer with
7 Defendants regarding the scope of this request. Costco will thereafter produce responsive,
8 nonprivileged documents created during the period of March 1, 1995, through November 25,
9 2007, to the extent such documents exist and are kept in the ordinary course of business, based on
10 a search of the files of an agreed upon list of custodians and search terms to be negotiated by the
11 parties.

12 **REQUEST NO. 27:** All Documents relating to the sharing of information between
13 manufacturers of CRTs.

14 **RESPONSE TO REQUEST NO. 27:** In addition to Costco's General Objections, which
15 Costco hereby incorporates by reference, Costco specifically objects to this Request to the extent
16 that it seeks information that is protected by the attorney-client privilege, joint-prosecution or
17 common-interest privileges, or the work-product doctrine. Costco also objects to this Request on
18 the grounds that it is overbroad, unduly burdensome, and oppressive, particularly insofar as it
19 seeks documents that are either publicly available or were produced in this litigation to Costco by
20 Defendants and its co-conspirators. Such documents are either already in Defendants'
21 possession, or can be obtained by Defendants from another source that is more convenient, less
22 burdensome, or less expensive. Costco also objects to this Request as overbroad with respect to
23 the unlimited period of time for which documents are requested.

24 Subject to and without waiving these objections, Costco offers to meet and confer with
25 Defendants regarding the scope of this request. Costco will thereafter produce responsive,
26 nonprivileged documents created during the period of March 1, 1995, through November 25,
27 2007, to the extent such documents exist and are kept in the ordinary course of business, based on
28

1 DATED: August 17, 2012

s/ *David J. Burman*

David J. Burman (admitted *pro hac vice*)

DBurman@perkinscoie.com

Nick Hesterberg (admitted *pro hac vice*)

NHesterberg@perkinscoie.com

Eric J. Weiss

EWeiss@perkinscoie.com

PERKINS COIE LLP

1201 Third Avenue, Suite 4800

Seattle, WA 98101-3099

Telephone: 206.359.8000

Facsimile: 206.359.9000

Joren Bass, Bar No. 208143

JBass@perkinscoie.com

PERKINS COIE LLP

Four Embarcadero Center, Suite 2400

San Francisco, CA 94111-4131

Telephone: 415.344.7120

Facsimile: 415.344.7320

Attorneys for Plaintiff

Costco Wholesale Corp.

EXHIBIT M

Robert W. Turken
Mitchell E. Widom
Scott N. Wagner
BILZIN SUMBERG BAENA PRICE &
AXELROD LLP
1450 Brickell Avenue, Suite 2300
Miami, Florida 33131-3456
Telephone: 305-374-7580
Facsimile: 305-374-7593
E-mail: rturken@bilzin.com; mwidom@bilzin.com;
swagner@bilzin.com

Stuart H. Singer
BOIES, SCHILLER, & FLEXNER LLP
401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, Florida 33301
Telephone: (954) 356-0011
Facsimile: (954) 356-0022
E-mail: ssinger@bsflp.com

*Counsel for Plaintiffs Tech Data Corporation
and Tech Data Product Management, Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

CASE No. 13-CV-00157-SC

Master File No. 07-5944 SC (N.D. Cal.)

This Document Relates to Individual Case
No. 13-CV-00157-SC

MDL No. 1917

TECH DATA CORPORATION; TECH
DATA PRODUCT MANAGEMENT,
INC.,

Plaintiffs,
vs.

AU OPTRONICS CORPORATION; *et al.*

Defendants.

**TECH DATA CORPORATION AND TECH
DATA PRODUCT MANAGEMENT, INC.'S
RESPONSES AND OBJECTIONS TO
PANASONIC CORPORATION AND
HITACHI ELECTRONIC DEVICES (USA),
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS**

1 to the discovery of admissible evidence. Tech Data also objects to the terms “revenue”, “costs”,
2 “profitability”, and “margins” as being vague and ambiguous.

3 Subject to and notwithstanding the foregoing objections, Tech Data states that its relevant
4 financial information is publicly available.

5
6 **REQUEST NO. 20:**

7 All Documents relating to your suspicion or belief that any entity was engaged in any
8 anticompetitive conduct relating to CRTs, including the date You first suspected such conduct and
9 the circumstances surrounding, and reasons for, such suspicions or beliefs.

10 **RESPONSE TO REQUEST NO. 20:**

11 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
12 Tech Data further objects to this Request on the grounds that it seeks information that is
13 protected by the attorney-client privilege, the work product doctrine, and/or any other protection
14 or privilege. Tech Data also objects to this Request on the grounds that it is overly broad, unduly
15 burdensome, vague, and ambiguous.

16 Subject to and notwithstanding the foregoing objections, Tech Data will produce
17 relevant, non-privileged documents created during the period of March 1, 1995 through
18 December 31, 2007 to the extent that such documents exist and are kept in the ordinary course of
19 business, based on an agreed upon list of search terms to be negotiated by the parties.

20
21 **REQUEST NO. 21:**

22 Without limitation as to time, all Documents relating to any statement or action that You
23 contend had the effect of concealing any of Your claims.

24 **RESPONSE TO REQUEST NO. 21:**

25 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
26 Tech Data further objects to this Request on the grounds that it seeks information that is
27 protected by the attorney-client privilege, the work product doctrine, and/or any other protection
28

1 or privilege. Tech Data also objects to this Request on the grounds that it is overly broad, unduly
2 burdensome, vague, and ambiguous.

3 Subject to and notwithstanding the foregoing objections, Tech Data will produce
4 relevant, non-privileged documents created during the period of March 1, 1995 through
5 December 31, 2007 to the extent that such documents exist and are kept in the ordinary course of
6 business, based on an agreed upon list of search terms to be negotiated by the parties.

7
8 **REQUEST NO. 22:**

9 Without limitation as to time, all Documents concerning any steps or actions taken by You
10 to discover the facts alleged in the Complaint that You contend support Your claims.

11 **RESPONSE TO REQUEST NO. 22:**

12 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
13 Tech Data further objects to this Request on the grounds that it seeks information that is
14 protected by the attorney-client privilege, the work product doctrine, and/or any other protection
15 or privilege. Tech Data also objects to this Request on the grounds that it is overly broad, unduly
16 burdensome, vague, and ambiguous.

17 Subject to and notwithstanding the foregoing objections, Tech Data will produce
18 relevant, non-privileged documents created during the period of March 1, 1995 through
19 December 31, 2007 to the extent that such documents exist and are kept in the ordinary course of
20 business, based on an agreed upon list of search terms to be negotiated by the parties.

21
22 **REQUEST NO. 23:**

23 All Documents relating to the sharing of information between manufacturers of CRTs.

24 **RESPONSE TO REQUEST NO. 23:**

25 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
26 Tech Data further objects to this Request on the grounds that it is overly broad, unduly
27 burdensome and oppressive, seeks or calls for the production of documents that are equally
28

REQUEST NO. 30:

All Documents relating to the allegations contained in paragraphs 143-146 of the Complaint.

RESPONSE TO REQUEST NO. 30:

Tech Data refers to and incorporates its General Objections as if set forth fully herein. Tech Data further objects to this Request on the grounds that it is overly broad, unduly burdensome and oppressive, and seeks or calls for the production of documents that are either publicly available, available as part of the U.S. Department of Justice investigation, or were already produced in this litigation. Such documents are either already in Defendants' possession, or can be obtained from another source that is more convenient, less burdensome, or less expensive.

Dated: August 5, 2013

Respectfully Submitted,

/s/Scott N. Wagner

ROBERT W. TURKEN
MITCHELL E. WIDOM
SCOTT N. WAGNER
BILZIN SUMBERG BAENA PRICE &
AXELROD LLP
1450 Brickell Ave., Suite 2300
Miami, Florida 33131-3456
Telephone: (305) 374-7580
Facsimile: (305) 374-7593
E-mail: rturken@bilzin.com
mwidom@bilzin.com
swagner@bilzin.com

STUART H. SINGER
BOIES, SCHILLER, & FLEXNER LLP
401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, Florida 33301
Telephone: (954) 356-0011
Facsimile: (954) 356-0022
E-mail: ssinger@bsfllp.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

WILLIAM A. ISAACSON
MELISSA WILLET
BOIES, SCHILLER & FLEXNER
5301 Wisconsin Ave. NW, Suite 800
Washington, DC 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
E-mail: wisaacson@bsfllp.com
mwillett@bsfllp.com

PHILIP J. IOVIENO
BOIES, SCHILLER & FLEXNER
10 North Pearl Street, 4th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
E-mail: piovieno@bsfllp.com

*Counsel for Plaintiffs Tech
Data Corporation and Tech Data Product
Management, Inc.*

Bilzin Sumberg Baena Price & Axelrod LLP
1450 Brickell Avenue, Suite 2300
Miami, FL 33131-3456

EXHIBIT N

Kenneth S. Marks
Jonathan J. Ross
SUSMAN GODFREY LLP
1000 Louisiana Street, Suite 5100
Houston, Texas 77002-5096
Telephone: (713) 651-9366
Facsimile: (713) 654-6666
kmarks@susmangodfrey.com
jross@susmangodfrey.com

*Attorneys for plaintiff Alfred H. Siegel, solely
in his capacity as Trustee of the Circuit City
Stores, Inc. Liquidating Trust*
[additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-5944 SC

MDL No. 1917

This Document Relates to:

Case No. 13-cv-05261 SC

ALFRED H. SIEGEL, AS TRUSTEE OF THE
CIRCUIT CITY STORES, INC.
LIQUIDATING TRUST,

Plaintiff,

v.

TECHNICOLOR SA.; et al.,

Defendants.

**RESPONSES AND OBJECTIONS OF
ALFRED H. SIEGEL, AS TRUSTEE OF
THE CIRCUIT CITY STORES, INC.
LIQUIDATING TRUST, TO FIRST
REQUEST FOR PRODUCTION OF
DOCUMENTS FROM THOMSON SA
AND THOMSON CONSUMER
ELECTRONICS, INC.**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust (“Circuit City Trust” or “Plaintiff”), hereby responds and objects to the First Set of Requests for Production of Thomson SA and Thomson Consumer Electronics, Inc. (collectively the “Requests” and individually a “Request”). For the reasons set forth below, Plaintiff generally and specifically objects and otherwise

1 Circuit City Trust further objects to the terms and phrases “investigated,” “attempted to
2 investigate,” and “relates to” as vague and ambiguous.

3
4 **REQUEST FOR PRODUCTION NO. 4:**

5 All DOCUMENTS related to when YOU learned of the existence of the alleged antitrust
6 conspiracy that is the subject of YOUR COMPLAINT.

7 **RESPONSE:**

8 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
9 herein. Circuit City Trust also objects to this Request on the grounds that it is overly broad,
10 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
11 evidence. Circuit City Trust further objects to the phrase “related to” as vague and ambiguous.
12 Subject to and without waiving these objections, Circuit City Trust previously produced
13 documents to the defendants in this litigation, which have been made available to the Thomson
14 Defendants. To the extent additional documents are located, if any exist, they will be produced.

15
16 **REQUEST FOR PRODUCTION NO. 5:**

17 All DOCUMENTS related to estimates of the production capacity, output, and/or prices
18 charged by the DEFENDANTS for CRTs and/or CRT Products during the Relevant Period.

19 **RESPONSE:**

20
21 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
22 herein. Circuit City Trust also objects to this Request on the grounds that it is overly broad,
23 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
24 evidence. Circuit City Trust further objects to the phrase “related to” as vague and ambiguous.
25 Subject to and without waiving these objections, Circuit City Trust previously produced
26 documents to the defendants in this litigation, which have been made available to the Thomson
27 Defendants. To the extent additional documents are located, if any exist, they will be produced.
28

1 extent additional documents are located, if any exist, they will be produced.

2 **REQUEST FOR PRODUCTION NO. 11:**

3 All DOCUMENTS referred to in or relied upon to prepare YOUR responses to the
4 Thomson Defendants' First Set of Interrogatories to YOU.

5 **RESPONSE:**

6
7 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
8 herein. Circuit City Trust also objects to this Request on the grounds that it is overly broad,
9 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
10 evidence. Subject to and without waiving these objections, to the extent that documents which
11 have not previously been produced to defendants in this litigation are referred to in Circuit City
12 Trust's responses to the Thomson Defendants' First Set of Interrogatories they will be produced.
13

14
15 Dated: July 10, 2014.

SUSMAN GODFREY L.L.P.

16
17 By: 

18 Kenneth S. Marks

19 Jonathan J. Ross

20 Johnny W. Carter

21 David M. Peterson

22 John P. Lahad

SUSMAN GODFREY L.L.P.

1000 Louisiana Street, Suite 5100

Houston, Texas 77002

Telephone: (713) 651-9366

Facsimile: (713) 654-6666

Email: kmarks@susmangodfrey.com

jross@susmangodfrey.com

jcarter@susmangodfrey.com

dpeterson@susmangodfrey.com

jlahad@susmangodfrey.com

1
2
3 Parker C. Folse III
4 Rachel S. Black
5 Jordan Connors
6 SUSMAN GODFREY L.L.P.
7 1201 Third Avenue, Suite 3800
8 Seattle, Washington 98101-3000
9 Telephone: (206) 516-3880
10 Facsimile: (206) 516-3883
11 Email: pfolse@susmangodfrey.com
12 rblack@susmangodfrey.com
13 jconnors@susmangodfrey.com

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
*Attorneys for plaintiff Alfred H. Siegel, solely in
his capacity as Trustee of the Circuit City
Stores, Inc. Liquidating Trust*